

**Town of Grafton  
Self-Evaluation and Transition Plan  
June 2019**

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**Prepared by:**

**Center for Living and Working, Inc.**

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**and**

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**188 Lower Westfield Road, Holyoke, MA 01040**

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*Disclaimer: This Self-Evaluation and Transition Plan is a “planning” document which is intended to identify areas of non compliance under the Federal Americans with Disabilities Act as it pertains to the provision of services, programs, and activities. In doing so, this Plan provides an evaluation of policies and procedures and provides recommendations and sample documents for compliance. This Plan also includes a facilities assessment to identify non-conforming building and site conditions including a description and applicable regulatory standards for compliance. This is not an engineering or architectural assessment nor does it provide engineering or design solutions. Construction solutions need to be designed by a qualified engineering or architectural professional in order to ensure compliance under the MAAB 521 CMR requirements and the 2010 ADA Standards for Accessible Design.*

# **TOWN OF GRAFTON – SELF-EVALUATION AND TRANSITION PLAN**

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## I. INTRODUCTION

The Center for Living and Working, Inc. in partnership with James M. Mazik, AICP – Consulting Services has prepared this Self-evaluation and Transition Plan (“Accessibility Plan” hereafter) on behalf of the Town of Grafton to determine its level of compliance under the Americans with Disability Act (ADA) of 1991, as amended in 2008 and 2010.

The ADA is a civil rights law. Under the ADA, civil rights are guaranteed to individuals who experience discrimination because they; 1) have a physical or mental impairment that substantially limits a major life activity, 2) have a record of such an impairment, and 3) are regarded as having such an impairment. The ADA provides civil rights protections to those with disabilities in a manner similar to that provided to individuals on the basis of race, color, sex, natural origin, age, and religion. The law is intended to insure that those with a disability cannot be excluded from participating in, or denied the benefits of programs, services and activities offered by state and local governments because of that disability.

Under Title II of the ADA, as amended, requires local municipalities to conduct a Self-Evaluation of programs and services as well as an evaluation of all facilities to document physical barriers to access as part of the requirements for developing a Transition Plan.

In Massachusetts, public buildings and facilities must adhere to Section 521 of the Code of Massachusetts Regulations, “521 CMR: Architectural Access Board”, a specialized section of the State Building Code as governed by the Massachusetts Architectural Access Board (M.G.L. c.22, S13A).

This ADA Self-evaluation and Transition Plan (“Accessibility Plan” hereafter) includes model policies and procedures for adoption by the town as well as barrier removal solutions for the Town’s public buildings and facilities. The assessment of physical barriers and subsequent recommendations are based on the current 2010 ADA Standards for Accessible Design (2010 ADA Standards) and MA State Building Code 521 C.M.R., the higher standard to prevail. Although there are exceptions and variations (described below), this Accessibility Plan and its recommendations are based on compliance with the current Federal and State standards and the measures required to do so.

## **II. AMERICANS WITH DISABILITIES ACT**

### **Background**

On July 26, 1990 President George H. Bush signed the Americans with Disabilities Act, a federal civil rights law that prohibits the exclusion of people with disabilities from the right of equal opportunity. Much of the ADA legislation was built upon legislation that had already been in place for a number of years including the Civil Rights act of 1964 and the Rehabilitation Act of 1973 which regulates employment practices in the federal government and by federal contractors, establishes architectural and transportation accessibility standards and guarantees equal access to entities that receive federal funds.

The ADA is a civil rights law. Under the ADA, civil rights are guaranteed to individuals who experience discrimination because they; 1) have a physical or mental impairment that substantially limits a major life activity, 2) have a record of such an impairment, and 3) are regarded as having such an impairment. Interpretation of the law and its enforcement was intended to be carried out on a case by case basis through the nation's legal system. Specific complaints of individuals may be filed with a number of different federal agencies including the Equal Employment Opportunity Commission (Title I), the United States Department of Justice (Titles II and III), the United States Department of Transportation (Titles II and III), and the Federal Communications Commission (Title IV).

The ADA is divided into five titles or sections. These are:

Title I: Employment

Title II: State and Local Government and Public Transportation

Title III: Public Accommodations and Services Operated by Private Entities

Title IV: Telecommunications

Title V: Miscellaneous Provisions

The Town of Grafton is bound specifically by Titles I and II.

There is a basic process for complying with the Americans with Disabilities Act:

- Learning about the requirements of the ADA and how it applies to a facility or program;
- Conducting a survey to identify barriers;
- Establishing a list of potential modifications for barrier removal, including changes to policies, facilities and cost estimates;
- Removing existing barriers.

The ADA prohibits discrimination on the basis of disability in all services, programs, and activities provided by small local governments (i.e. towns). Thus, people with disabilities must have an equal opportunity to participate in and benefit from a town's services, programs and activities. To accomplish this, the ADA sets requirements for town facilities, new construction and alterations, communication with the public and policies and procedures governing town programs, services, and activities.

All towns must perform a self-evaluation of its policies, practices, programs, procedures, services, etc. (including communication) to determine compliance under the ADA. Towns must make reasonable modifications to these policies, programs, services, etc. to avoid discrimination against individuals with

disabilities unless such modification would result in a fundamental alteration in the nature of that program or service.

Although the ADA only requires local governments with 50 or more employees to take additional, specific measures, it is strongly encouraged that even smaller towns with less than 50 employees follow the same process to insure overall compliance with the ADA. These additional measures include 1) the designation of an individual to coordinate ADA compliance, 2) the development of a transition plan, and 3) the development of an ADA grievance procedure.

The 2008 Amendments to the ADA broadened the definition of "disability", thereby extending the ADA's protections to a greater number of people. The 2008 Amendments provided examples which limit "major life activities" including, but not limited to, "caring for oneself, performing manual tasks, seeing, hearing, eating, sleeping, walking, standing, lifting, bending, speaking, breathing, learning, reading, concentrating, thinking, communicating, and working" as well as the operation of several specified major bodily functions. The Amendments also stated that when determining whether one qualifies as disabled, one cannot take into account the mitigating effects of assistive devices, auxiliary aids, accommodations, medical therapies, and supplies. In order to be protected under the ADA, an individual with a disability must also be qualified to perform the essential functions of a job with or without a reasonable accommodation. In 2010, the Department of Justice's revised regulations for Titles II and III of the ADA of 1990. These regulations adopted revised, enforceable accessibility standards called the 2010 ADA Standards for Accessible Design. On March 15, 2012, compliance with the 2010 Standards was required for new construction and alterations under Titles II and III. March 15, 2012, is also the compliance date for using the 2010 Standards for program accessibility and barrier removal. The 1991 ADA Standards for Accessible Design could be used for new construction and alterations under Titles II and III until March 14, 2012.

## **Title I**

### *Equal Employment Opportunity*

The ADA guarantees equal employment opportunities to people with disabilities who are qualified for a job. The ADA specifically prohibits discrimination in all activities relating to employment. This includes hiring, termination, compensation, recruitment, tenure, job training, advancement and promotion, layoff, fringe benefits, and any other employment-related benefits or activities. Employers, including municipal governments, should carefully review their employment policies and procedures to eliminate discriminatory practices. In many cases, discrimination is unintentional, due to a lack of knowledge and awareness of the employer. The ADA covers all aspects of "employment" including the application and interview process, hiring, promotion, termination, compensation and benefits, and training.

### *Reasonable Accommodations*

Qualified applicants for employment are entitled to "reasonable accommodation" during the hiring process and as part of his/her employment. The term reasonable accommodation can mean many different things depending on the circumstance and what is "reasonable" under that circumstance. It may mean modifying an existing facility so that a person with a disability can perform his/her job (i.e. replace a door handle with a lever, lower a counter top, etc.), changing the way things are customarily done (office policy, work hours, etc.) or restructuring a job. It is the responsibility of the employer to provide a reasonable accommodation unless it would impose an "undue hardship" on the employer or detract from the essential functions of a position. Once the proposed accommodation becomes too difficult or expensive, it can be deemed as no longer reasonable and therefore, not required. *Caution:* What is unreasonable for an employer of six persons, may be deemed reasonable for an employer of twenty-five persons.

## **Title II**

### *Program Accessibility*

The ADA guarantees people with disabilities equal opportunity to participate in all programs, services, and activities of state and local government. Accessibility standards must be followed for new construction as well as accommodations. These standards are based on the ADA Accessibility Guidelines (ADAAG) as developed by the U.S. Access Board provide guidance to the ADA Standards for Accessible Design as enforced by the U.S. Department of Justice (DOJ), U.S. Department of Transportation (DOT), and the federal courts and apply nationwide.

The ADAAG involves a distinction between public or common use area and employee work areas. Public/common use areas must be fully accessible. Employee work areas may be addressed through Title I and "reasonable accommodations" made when the need arises. A higher level of expectation is anticipated for governmental entities than that of the private sector. Regardless of receipt of federal aid, all local governments and their boards, departments, commissions and districts are subject to the provisions of the ADA. Access to services is a critical aspect and basic premise of the ADA. Governmental sponsored programs, services and activities must be available to all, regardless of disability. If structural changes to buildings are required, a transition plan is also usually required. New construction and/or additions to local governmental buildings must be fully compliant and accessible to those with disabilities. Alterations to space used by the public as well as employee work areas must also be ADA compliant unless it is "technically infeasible" to do so (i.e. involves structural, physical, or site constraints). If technically infeasible, the alteration must comply "to the maximum extent feasible". Existing buildings require that the services or programs offered in that facility are readily accessible.

When programs, services, or activities are located in facilities that existed prior to January 26, 1992, the effective date of Title II of the ADA, towns must make sure that they are also available to persons with disabilities. If however, it requires that these programs, services, or activities are substantially altered to provide access or results in undue financial or administrative burden, then reasonable alternatives or accommodations may be allowed. When a service, program, or activity is located in a building that is not accessible, Title II of the ADA allows a "small" local government to achieve program accessibility in several ways. This can include:

- relocating the program, service, or activity to an accessible facility; or
- providing the program, service, or activity in another manner that meets ADA requirements;  
or
- undertaking modifications to the building or facility itself to provide accessibility.

Thus, to achieve program accessibility, a small town need not make every existing facility accessible. It can relocate some programs to accessible facilities and modify other facilities, avoiding expensive physical modifications of all town facilities.

### *Effective Communication*

Local governments must ensure effective communication with individuals with disabilities. Where necessary to ensure that communications with individuals with hearing, vision, or speech impairments are as effective as communications with others, municipal governments must provide appropriate auxiliary aids.

The type of auxiliary aid or service necessary to ensure effective communication will vary according to the type of communication involved and the needs of the individual. "Auxiliary aids" include such



services or devices as sign language interpreters, assistive listening headsets, television captioning and decoders, telecommunications devices for deaf persons (TDD's), videotext displays, readers, taped texts, Brailled materials, computer disks, audio recordings, and large print materials. In addition, telephone emergency services, including 911 services, must provide direct access to individuals with speech or hearing impairments.

Municipal governments are not required to provide auxiliary aids or take any actions that would result in a fundamental alteration in the nature of a service, program, or activity or that will result in undue financial and administrative burdens. However, alternative auxiliary aids that do not result in a fundamental alteration or undue burden must be provided. For example, it is not necessary to provide sign language interpreters for all interactions with persons who are deaf or hard of hearing. Daily interaction may suffice through written notes or similar exchanges. However, public meetings, interrogations by local police officers, or similar technical interactions will most likely require interpreters or assistive listening systems. It is required that alternative auxiliary aids be available that do not result in financial or administrative burdens yet meet the needs of the disabled individual.

### **Title III**

Title III of the Americans with Disabilities Act requires public accommodations to provide goods and services to people with disabilities on an equal basis with the rest of the general public. It is intended that all individuals have the opportunity to benefit from businesses and services of a place of public accommodation. The regulations require that architectural and communication barriers that are structural must be removed in public areas of existing facilities when their removal is readily achievable. Public accommodations that must meet the barrier removal requirement include a broad range of establishments (both for- and non-profit) such as inns, hotels, motels, restaurants, bars, theaters, concert halls, stadiums, museums, auditoriums, retail stores, grocery stores, bakeries, laundromats, banks, barber and beauty shops, gas stations, professional offices, medical offices, private schools, health spas, bowling alleys and other places that serve the public. Private entities that own, lease, lease out, or operate places of public accommodation in existing buildings are responsible for complying with the barrier removal requirement. Private clubs and religious organizations, including places of worship, are exempt from the ADA public accommodation requirements.

### **Title IV**

Title IV requires common carriers engaged in interstate communications by wire or radio to provide telecommunications relay services for both hearing- and speech-impaired individuals. Regulations developed to implement this provision require that these services operate 24 hours a day. It is the intention to give those persons with hearing and speech impairments the opportunity to communicate with any other individual. This is to be achieved in a manner such that the users are not paying greater rates than those for equivalent services used by persons without hearing or speech impairments. In addition, any televised public service announcements provided or funded in whole or in part by any federal agency or instrument of the federal government must include closed captioning of the verbal content of such announcement.

### **Title V**

Title V consists of various miscellaneous provisions of the ADA including a requirement for the development of technical assistance manuals by the appropriate regulatory federal agency, a report on the ADA and wilderness areas, a description of the responsibility of the United States Congress, religious organizations, and enforcement and dispute resolution.

### **Definition of Commonly Used Terms**

*Disability* - a physical or mental impairment that substantially limits a major life activity, such as walking, seeing, hearing, learning, breathing, caring for oneself, or working. To be protected under the ADA, a person must have, have a record of, or be regarded as having a record of, a substantial impairment. A substantial impairment is one that significantly limits or restricts a major life activity such as hearing, seeing, speaking, breathing, performing manual tasks, walking, caring for oneself, learning or working. Individuals who have successfully completed or are currently enrolled in a drug or alcohol rehabilitation program are also considered to be disabled. The ADA protects three classes of people with disabilities:

- those who have a disability, and
- those who have a record of having a disability, and
- those who are regarded as having a disability, whether or not they actually have one.

*Qualified Individual with a Disability* - an employee or job applicant who meets legitimate skill, experience, education, or other requirements of an employment position that he or she holds or seeks. The person must also be able to perform the "essential" (as opposed to marginal or incidental) functions of the position either with or without reasonable accommodation. Job requirements that screen out or tend to screen out people with disabilities are legitimate only if they are job-related and consistent with business necessity.

*Reasonable Accommodation* - any change or adjustment to a job or work environment that permits a qualified applicant or employee with a disability to participate in the job application process, to perform the essential functions of a job, or to enjoy benefits and privileges of employment equal to those enjoyed by employees without disabilities. For example, reasonable accommodations may include: acquiring or modifying equipment or devices, job restructuring, modifying work hours, making the workplace structurally accessible to individuals with disabilities, reassigning an employee with a disability to an equivalent position as soon as one becomes vacant, providing qualified readers for the blind or interpreters for the deaf, and/or appropriately adjusting or modifying examinations, training materials, or policies.

*Essential Functions* – the basic job duties that an employee must perform, with or without reasonable accommodation.

*Readily Achievable* - the removal of physical barriers which are easily accomplishable without much difficulty or expense. The "readily achievable" requirement is based on the size and resources available. For example, a larger business with more resources is expected to take a more active role in removing barriers than smaller businesses. The ADA also recognizes that economic conditions vary. When a business has resources to remove barriers, it is expected to do so; but when profits are down, barrier removal may be reduced or delayed. Barrier removal is an ongoing obligation, thus physical barriers must be removed as resources become available in the future.

*Undue Hardship* - an action or accommodation which requires significant difficulty or expense for an entity. Criteria for making such a determination include the nature and cost of the accommodation, the financial resources of the employer, or the impact of such accommodations on the financial resources of the employer.

*Programmatic Access* –Programmatic access requires that a public entity shall operate each service, program, or activity so that the service, program, or activity, when viewed in its entirety, is readily accessible to and usable by individuals with disabilities.

### **Program Accessibility**

Under Title II of the ADA, the town of Grafton must ensure that when “viewed in entirety”, all programs, services, and activities that are offered must be equally available to persons with disabilities. The Town is not necessarily required to remove architectural barriers from a building or site, but rather, must make sure that its programs are accessible. Non-structural methods to achieve program accessibility include:

- relocating a program or service to an accessible location in the existing building or facility, or
- relocation of a program or service to a different building or facility, or
- providing short-term or intermediate modifications to ensure program access until a permanent or structural solution is achieved (Example – creating an accessible meeting space on the first floor of a building such that staff providing services on a second or third floor can meet with persons in the accessible first floor space).

### **III. OTHER FEDERAL ACCESSIBILITY REGULATIONS**

#### **Architectural Barriers Act (ABA) - 1968**

The Architectural Barriers Act requires access to facilities designed, built or altered with Federal funds or leased by Federal agencies. The law covers a wide range of facilities, including post offices, social security offices, prisons, and national parks. It also applies to non-government facilities that have received Federal funding, such as certain schools, public housing, and mass transit systems. Passed in 1968, the ABA is the first measure by Congress to ensure access to the built environment. Facilities that predate the law generally are not covered, but alterations or leases undertaken after the law took effect can trigger coverage. Building construction changes made under this law, must meet the Uniform Federal Accessibility Standards (UFAS). Special provisions are included in the UFAS for historic buildings that would be threatened or destroyed by meeting full accessibility requirements

#### **Rehabilitation Act - 1973**

The Rehabilitation Act requires recipients of federal financial assistance to make their programs and activities accessible to everyone. Recipients are allowed to make their properties accessible by altering buildings, by moving programs and activities to accessible spaces, or by making other accommodations. It also protects the rights of Federal employees with disabilities. The law also requires electronic and information technology procured by Federal agencies to be accessible according to certain established standards.

#### **Voting Accessibility for the Elderly and Handicapped Act - 1984**

The Voting Accessibility for the Elderly and Handicapped Act of 1984 generally requires polling places across the United States to be physically accessible to people with disabilities for federal elections. Where no accessible location is available to serve as a polling place, a political subdivision must provide an alternate means of casting a ballot on the day of the election. This law also requires states to make registration and voting aids available for disabled and elderly voters, including information by telecommunications devices for the deaf (TDDs), which are also known as teletypewriters (TTYs).

#### **Telecommunications Act - 1996**

The Telecommunications Act of 1996 requires telecommunications products and services to be accessible according to guidelines developed by the Access Board. It covers a broad range of products, including telephones, cellular phones, pagers, and fax machines. The Federal Communications Commission (FCC) enforces requirements of the law.

#### **Help America Vote Act – 2002**

Each polling place must have at least one accessible voting machine by January 1, 2006 under the Help America Vote Act. The act (Public Law 107-252), which was signed by President Bush on October 29, 2002 also requires each piece of voting equipment bought with federal money on or after January 1, 2007 to be accessible.

#### **IV. 521 CODE OF MASSACHUSETTS REGULATIONS ARCHITECTURAL ACCESS BOARD (MGL C. 22, S. 13a)**

Section 521 of the Code of Massachusetts Regulations, "521 CMR: Architectural Access Board" is a specialized section of the State Building Code which provides the actual construction standards and specifications which must be adhered to for work performed on "public" buildings (see definition of public building in 521 CMR) in the Commonwealth of Massachusetts. The purpose of 521 CMR is to make public buildings and facilities accessible to, functional for, and safe for use by persons with disabilities. It is the intent of 521 CMR to provide persons with disabilities full, free and safe use of all buildings and facilities so that all such persons may have the educational, living and recreational opportunities necessary to be as self-sufficient as possible and to assume full responsibilities as citizens.

The Massachusetts Architectural Access Board (MAAB) is a regulatory agency whose mandate, as established under M.G.L. c.22 S13A, is to develop and enforce regulations pertaining to public access. The MAAB also decides on variance requests, issues advisory opinions, and makes decisions on complaints. Local building inspectors are responsible for enforcement of the provisions of 521 CMR.

##### Jurisdiction of 521 CMR

All additions to, reconstruction, remodeling, and alterations or repairs of existing public buildings, which require a building permit or which are so defined by a state or local inspector, shall be governed by those applicable sections of 521 CMR.

If the work being performed amounts to less than 30% of the full and fair cash value of the building and

- a) the work costs less than \$100,000, then only the work being performed is required to comply with 521 CMR; or
- b) the work costs \$100,000 or more, then the work being performed is required to comply and an accessible entrance, toilet, telephone and drinking fountain (if toilets, telephones and drinking fountains are provided) are also required.

If the work performed amounts to 30% or more of the full and fair cash value of the building, the entire building is required to comply with 521 CMR. Where the cost of constructing an addition to a building amounts to 30% or more of the full and fair cash value of the existing building, both the addition and the existing building must be fully accessible.

A historic building or facility that is listed or is eligible for listing in the National or State Register of Historic Places or is designated as historic under appropriate state or local bylaws may be granted a variance by the MAAB to allow alternate accessibility.

The MAAB Regulations also address various circumstances involving change in use, work performed over a period of time, multiple uses of one building, outdoor facilities, temporary structures, security structures and non-occupiable spaces. For more information on these areas, the administrative process (variances, complaints, hearings) as well as specific architectural requirements, reference to 521 CMR should be made.

## **V. ALTERATIONS TO HISTORIC PROPERTIES**

### **ADA 2010 Standards**

There are exceptions for alterations to qualified historic buildings and facilities for accessible routes (206.2.1 Exception 1 and 206.2.3 Exception 7); entrances (206.4 Exception 2); and toilet facilities (213.2 Exception 2). When an entity believes that compliance with the requirements for any of these elements would threaten or destroy the historic significance of the building or facility, the entity should consult with the State Historic Preservation Officer. If the State Historic Preservation Officer agrees that compliance with the requirements for a specific element would threaten or destroy the historic significance of the building or facility, use of the exception is permitted.

Public entities have an additional obligation to achieve program accessibility under the Department of Justice ADA regulations (See 28 CFR 35.150). These regulations require public entities that operate historic preservation programs to give priority to methods that provide physical access to individuals with disabilities. If alterations to a qualified historic building or facility to achieve program accessibility would threaten or destroy the historic significance of the building or facility, fundamentally alter the program, or result in undue financial or administrative burdens, the Department of Justice ADA regulations allow alternative methods to be used to achieve program accessibility. In the case of historic preservation programs, such as an historic house museum, alternative methods include using audio-visual materials to depict portions of the house that cannot otherwise be made accessible. In the case of other qualified historic properties, such as an historic government office building, alternative methods include relocating programs and services to accessible locations. The Department of Justice ADA regulations also allow public entities to use alternative methods when altering qualified historic buildings or facilities in the rare situations where the State Historic Preservation Officer determines that it is not feasible to provide physical access using the exceptions permitted in Section 202.5 without threatening or destroying the historic significance of the building or facility. See 28 CFR 35.151(d).

### **Massachusetts 521 CMR**

A historic building or facility that is listed or is eligible for listing in the National or State Register of Historic Places or is designated as historic under appropriate state or local laws may be granted a variance by the Architectural Access Board to allow alternate accessibility. If a variance is requested on the basis of historical significance, then consultation with the Massachusetts Historical Commission is required in order to determine whether a building or facility is eligible for listing or listed in the National or State Register of Historic Places. The Massachusetts Historical Commission may request a copy of the proposed variance request and supporting documentation to substantiate the variance request and its effect on historic resources. A written statement from the Massachusetts Historical Commission is required with the application for variance.

## VI. ADA SELF-EVALUATION

All municipalities must perform a self-evaluation of its policies, practices, programs, procedures, services, etc. (including communication) to determine compliance under the ADA. Municipalities must make reasonable modifications to these policies, programs, services, etc. to avoid discrimination against individuals with disabilities unless such modification would result in a fundamental alteration in the nature of that program or service.

Although the ADA only requires local governments with 50 or more employees to take additional, specific measures, it is strongly encouraged that even smaller municipalities with less than 50 employees follow the same process to insure overall compliance with the ADA. These additional measures include 1) the designation of an individual to coordinate ADA compliance, 2) the development of a transition plan, and 3) the development of an ADA grievance procedure.

All local governmental entities were required to complete a self-evaluation of their facilities, programs, policies, and practices by January 26, 1993. The self-evaluation identifies and corrects those policies and practices that are inconsistent with Title II's requirements. Self-evaluations should consider all of a municipality's programs, activities, and services, as well as the policies and practices that it has put in place to implement its various programs and services. Remedial measures necessary to bring the programs, policies, and services into compliance with Title II should be specified - including, but not limited to 1) relocation of programs to accessible facilities; 2) offering programs in an alternative accessible manner; 3) structural changes to provide program access; 4) policy modifications to ensure nondiscrimination; and 5) auxiliary aids needed to provide effective communication.

Under Title II of the ADA a municipality is required to:

1. Designate a responsible employee as ADA Coordinator.
2. Adopt and distribute a Public Notice on the municipality's ADA policies and procedures.
3. Adopt, distribute and/or post an ADA Grievance Procedure.
4. Modify, maintain, and update policies, procedures, and practices, including job descriptions and hiring practices, as required.
5. Provide Reasonable Accommodations to qualified individuals with disabilities.
6. Maintain and upkeep accessible features.
7. Provide auxiliary aids and services to ensure effective communications to those with disabilities.

It is also recommended under the provisions of MGL C40 s8J that towns establish a 5 to 13 member Commission on Disability. This can be achieved through acceptance of *"the provisions of Massachusetts General Laws Chapter 40, Section 8J relative to the establishment of the municipal Commission on Disability"*.

A self-evaluation was conducted of those municipal departments which offer programs or provides services to the general public. A memo and accompanying survey form (See Appendix A) was sent to all departments, boards, commissions and individuals who were identified as either providing a service or program to area residents.

Information from each survey response, along with supplemental department information was used to develop the self-evaluation. Together with the structural assessment and policy recommendations, an accessibility compliance plan for the Town of Grafton is achieved.

#### **Commission on Disability (MGL C40 s8J)**

Massachusetts General Law Chapter 40 Section 8J gives municipalities the authority to establish commissions.

The function of a disabilities commission is to:

- Advise and assist municipal officials in ensuring compliance with federal and state disability laws;
- Review policies and activities of municipal departments and boards as they affect persons with disabilities;
- Provide information, referral, advocacy and technical assistance to individuals, businesses and organizations in all matters pertaining to disability;
- Coordinate the activities of other local groups organized to meet the needs of persons with disabilities.

Commissions consist of no less than five and no more than nine members chosen by the Board of Selectman or Town Manager (in a town) and the Mayor or City Manager (in a city). The majority must be persons with disabilities and one may be a member of the immediate family of a person with a disability. In addition, one member must be an elected or appointed municipal official.

**Grafton Self-evaluation.** *Commissions on Disability are established by vote of Town Meeting to promote the inclusion and integration of persons with disabilities in the activities, services and employment opportunities or the community. MGL Chapter 40 Section 8J gives municipalities the authority to establish Commissions on Disability. The Town of Grafton appears to have a formal Commission on Disability as noted on the town website, but all 4 member terms appear to have expired 3 to 5 years ago. As the Commission is not listed in the 2017 Annual Report, it appears that the Commission is no longer active.*

*The Town of Grafton appears to have had a formal Commission on Disability as noted on the town website, but all 4 member terms appear to have expired 3 to 5 years ago. The Commission on Disability is not listed in the 2017 or 2018 Annual Report, nor is listed in the Mass Office on Disability April 2019 listing of Municipal Commissions on Disability. It appears that the Commission is no longer active.*

*The Commission was first established at the annual Town Meeting of October 20, 2008 and their first meeting occurred on April 16, 2009. In October 2009, the Board of Selectmen voted to exercise its authority under MGL, Chapter 40, Section 22G to appropriate all fines received from handicap parking violations to the Commission on Disability.*



*If the Commission is no longer active, it is recommended that the Town re-establish its Commission and appoint a minimum of 5 members to serve on this board. Once in place, the Commission should actively post information about the Commission, its meetings, and town disability-related policies on the town's website and in the municipal office building.*

#### **ADA Coordinator (ADA Title II - 28 CFR Part 35.107 (a))**

The role of the ADA Coordinator is extensive and includes:

- insuring overall compliance with the ADA
- notification and outreach
- addressing grievances as filed under the town's established grievance policy
- insuring timely implementation of the town's transition plan
- on-going assessment of programs and services
- serving as a technical advisor and resource on accessibility matters.

In order for a municipality to successfully comply with the intent of the ADA, it is critical that its ADA Coordinator take a pro-active role in performing his or her role. It is not adequate for an ADA Coordinator to serve only as a decision-making authority under the town's ADA grievance procedure. The ADA Coordinator must monitor daily and long-term compliance with the town's ADA policies, procedures, and plans. This includes ADA compliance and assurance pertaining to postings, employment practices, education, dissemination of literature to the public and private businesses, daily activities and practices of town government, insuring that facilities are properly maintained, serving as a town-wide resource on accessibility matters and issues, and staying current on changes in state and federal law, regulations, programs, policies, interpretations, and decisions which affect persons with disabilities.

**Grafton Self-evaluation.** *According to Administrative Policy #112, Mr. Robert Berger is listed as the ADA Coordinator. Mr. Berger is currently serving as the Town's Inspector of Buildings. It would be more appropriate to name the position of Inspector of Buildings as the ADA Coordinator as opposed to a specific individual. If a change in personnel occurs, then the person assuming the new title of Inspector of Buildings would automatically assume the role as ADA Coordinator. Currently, this would not occur as the appointment is specific to a named individual. In addition, there is nothing "in writing" which confirms this as there is no such designation listed in the municipal office building, on the town's website, or in the annual report. It is recommended that the Town add this position to its webpage as part of the Commission on Disability's page and also listed as an Appointed Official. It is also recommended that such designation be posted in municipal office building and be listed and described in the Town's Annual Reports.*

#### **Public Notice (ADA Title II - 35 CFR Part 35.106)**

Title II of the ADA requires that public entities notify participants of its non-discrimination policies. Similarly, there should also be notification of non-discrimination policies relative to persons with

disabilities in brochures and other materials provided to the public and on a town's website. All Notices should also include the ADA Coordinator's name and contact information.

***Grafton Self-evaluation.*** Title II of the ADA requires that public entities notify participants of its non-discrimination policies. There does not appear to be such notification of non-discrimination policies relative to persons with disabilities in brochures or posted in the town hall. There is language of non-discrimination in Chapter III General Personnel Policies in the Employee Personnel Handbook in the Human Resources portion of the Grafton's website. However, this policy speaks only to Equal Employment Opportunity and Non-Discrimination in hiring and employment practices. In addition there is a non-discrimination reference regarding disability under General Policies in the 2019 Spring & Summer Grafton Recreation Magazine.

A town must provide notice to the public about its ADA obligations and about accessible facilities and services in the town. The notice must inform the public about the ADA's nondiscrimination requirements. It may also describe how the public or employees may contact specific town officials about problems with accessibility and the need for effective communication. The information must be accessible to the public, including people who have disabilities that affect communication, such as blindness, low vision, deafness, and hearing loss. Although no specific method is required to reach the public, notice can be provided in more than one format and by using more than one type of media, such as the town's website, print, radio, or television.

Self-Evaluation survey responses to the question "Is the public informed that their programs are prepared to make reasonable modification" were mostly no or non-applicable. Only two Departmental Self-Evaluation Survey responses were yes, Council on Aging and the Assessor's office but nowhere on the Town's website is this actually indicated.

Five of the twelve survey responders indicated that there were circumstances that participation of a person with a disability in a program or service would be restricted or excluded. Most restrictions were due to accessibility or location such as narrow doorways or books located on the upper shelves in the Library. However, six of the twelve survey responders indicated that these exclusions or restrictions were not necessary to the operation of the operation of the program/department or the safety of non-disabled persons. Four responses were "Not Applicable". The Recreation Department did note "Yes" but did not indicate how or why. It appears that survey responders may have been confused by Questions #3 and #4 of the survey.

Based on the survey comments, the response to public notification and reasonable accommodations were mixed – ranging from "the public is not aware" to "not applicable." Only three departments said that the public is informed that this program/service is prepared to make reasonable modifications. Most departments noted that staff will assist those needing assistance upon request. The Library noted that it plans to provide a reasonable modifications statement on its services and programs website pages and that an accessibility policy is in the process of being developed to be adopted by the Library Trustees. This policy has been in draft form since 2003.

A single and consistent Public Notification Policy should be in place for all town functions, activities, departments, and committees. **A sample Public Notice is provided as Attachment B.**

### **ADA Grievance Procedure (ADA Title II - 35 CFR Part 35.107 (b))**

The ADA Title II regulations require that all municipalities with 50 or more employees (regional school systems must prorate the number of employees for each member community) adopt and publish grievance procedures. The purpose is to encourage local resolution of complaints concerning employment, services, programs and activities. It is important to note that complainants are not required to exhaust the municipality's procedures before filing a federal complaint or taking court action.

The regulations do not stipulate time frames or procedures for the grievance procedure, however, the following are recommended:

- A detailed description of the procedures for submitting a complaint;
- A two-step review process which allows for appeal;
- Reasonable timeframes for review and resolution of the complaint;
- Good record keeping for all complaints submitted and documentation of steps taken toward resolution.

**Grafton Self-evaluation.** *Administrative Policy #112 is the adopted ADA Grievance Procedure for the Town of Grafton as required under the ADA. However, there is no mention of such a policy on the Town's website nor is it posted anywhere in town hall. It is recommended that the Town of Grafton modify the current Commission on Disability webpage or create a separate Disabilities related section on its website and post relevant information such as the Grievance Procedure, public notices that allow for accommodation requests and the designated ADA Coordinator contact information.*

### **Policies/Procedures/Practices (ADA Title II - 35 CFR Part 35.130 (b)(7))**

A municipality should have formal separate policies and procedures pertaining to the ADA and program accessibility, grievances, communications, equal opportunity and non-discrimination except when it comes to employment opportunities. The Town should also include non-discrimination language in its employment postings and/or forms similar to that provided below.

*"The Town of Grafton is an Equal Opportunity/ Affirmative Action Employer. We assure you that your opportunity for employment with the town will be based only on your merit, without regard to race, religion, sex, age, national origin or disability"*

**Grafton Self-evaluation.** *A public entity shall make reasonable modifications in policies, practices, or procedures when the modifications are necessary to avoid discrimination on the basis of disability, unless the public entity can demonstrate that making the modifications would fundamentally alter the nature of the service, program, or activity.*

*The Town of Grafton does not appear to have formal policies and procedures pertaining to the ADA and program accessibility, grievances, communications, equal opportunity and non-discrimination except when it comes to employment opportunities. There are no indications anywhere on the Town's website.*

*There is an Employee Personnel Handbook available in the Human Resources tab that is*

accessed through the Employment Opportunities/Human Resources. It is a PDF file and it describes a Grievance Policy and Procedure but it is more generalized and does not specifically refer to disability. An individual has to navigate through a few web pages in order to access this handbook.

Section 36 of the Employee Personnel Handbook refers to Individuals with Disabilities –“The Town of Grafton is committed to realizing the full potential of all its employees regardless of their physical or mental disabilities. The Americans with Disabilities Act (ADA) requires employers to make reasonable accommodations to allow disabled employees to perform the essential functions of their jobs. Accommodation is an interactive process where you work with your employer to find a reasonable accommodation. If you require an accommodation, contact your Department Head or Town Administrator to discuss accommodation options. The Town of Grafton will make the final determination of what accommodation is reasonable”.

A review of job postings on the town’s website as well as the job descriptions provided with the self-evaluation surveys note disparities and a lack of consistency in the content of the job descriptions. Some descriptions provided “essential functions” as well as “physical and mental requirements” including physical demands, motor skills, and visual demands whereas others did not. The jobs posted on the Town’s website had the following verbiage about being an equal opportunity employer:

#### **Equal Opportunity Employer**

Grafton Public Schools is committed to maintaining a work and learning environment free from discrimination on the basis of race, color, religion, national origin, pregnancy, gender, sexual orientation, marital/civil union status, ancestry, place of birth, age, citizenship status, veteran status, political affiliation or disability, as defined and required by state and federal laws.

The job descriptions that came with completed Self-Evaluations did not state being an Equal Opportunity Employer but they did speak to making reasonable accommodations to enable individuals with disabilities to perform the essential functions as illustrated below:

#### **Physical and Mental Requirements**

The physical demands described here are representative of those that must be met by an employee to successfully perform the essential functions of this job. Reasonable accommodations may be made to enable individuals with disabilities to perform the position’s essential functions.

The Council on Aging (COA) stated that “occasionally, a person with a wheelchair or walker may not be able to go on a charter bus trip because they cannot get on and off the bus by themselves or if the trip includes a lot of walking”. If the reason a person using a wheelchair or walker can’t go on the trip is because the charter bus doesn’t have a lift or a ramp, the COA must arrange to charter a bus that is accessible. This is a perfect example of a reasonable accommodation and the need for the public to be notified under the ADA. The COA would be allowed to create a time line such as two weeks for them to locate an accessible vehicle in their accommodations policy.

There should be consistency in all departmental policies, procedures, and practices including the posting of employment ads, actual job descriptions, and reasonable accommodations to potential and existing employees. **(See Reasonable Accommodations).**

### **Reasonable Accommodations(ADA Title II - 35 CFR Part 35.140 (a))**

Under the ADA, a person is considered a qualified individual with a disability if s/he can perform essential functions of the job with or without a reasonable accommodation. Although the ADA does not require an employer to have job descriptions, they can be used as evidence of the essential functions of the job. Job descriptions should be up-to-date and should differentiate between the essential and the marginal duties of the position.

**Grafton Self-evaluation.** *Not all job descriptions included language on the work environment and also on ADA Special Requirements including physical ability, sensory requirements, and environmental factors. The job descriptions that accompanied the completed Self-Evaluation surveys included most of the above-mentioned details compared to the job descriptions available on the Town's website. The job descriptions that were online just made the Equal Opportunity Employer Reference.*

*All job descriptions must contain the essential functions required to do the job but typically do not list marginal duties, which should be included. It should also be noted that if a medical examination is required, it must be required of all entering employees of the same position. Medical examinations are prohibited until after a job offer has been made to the applicant. Employment can be conditioned on the results of the applicant's post-offer medical examination.*

*Job Descriptions. Job descriptions should use clear, concise, non-technical language. In defining essential functions, the description should focus on the outcome and not the process to achieve that outcome. For example, if a position requires lifting supplies onto a truck, the description should read, "the ability to lift supplies weighing up to 35 lbs to a height of 4 feet and into a truck bed" and not "the ability to manually lift supplies weighing 35 lbs". It also better to use words that describe the job requirements as opposed to words that focus on specific abilities (ie – hearing, speaking, walking). The following table provides preferred wording that does not restrict the physical requirements of positions.*

#### **Physical RequirementsSuggested Wording**

<i>Stand or sit</i>	<i>Stationary position</i>
<i>Walk</i>	<i>Move, traverse</i>
<i>Use hands and fingers</i>	<i>Operate, use</i>
<i>Climb Stairs or ladders</i>	<i>Ascend, descend</i>
<i>See</i>	<i>Detect, determine, identify recognize, observe</i>
<i>Taste/smell</i>	<i>Detect, distinguish, determine</i>
<i>Carry/lift</i>	<i>Move, transport, position</i>

*Reasonable Accommodations. The town does not appear to have a Reasonable Accommodations Policy in place for existing or potential employees. Under Title II of the ADA, reasonable accommodations may be made to enable individuals with disabilities to perform the essential functions of his/her job. **A sample Reasonable Accommodations Policy and Request Form for adoption by the Selectmen is provided as Appendix C and D.***

### **Maintenance (ADA Title II – 28 CFR Part 35.133 (a))**

A municipality must maintain in operable working condition those features that are necessary to provide access to services, programs, and activities. This includes door closers, sidewalks, parking space signage and striping, and ramps, among many other things. Isolated or temporary interruptions in service or access are permitted for maintenance or repairs. However, this is deemed as short-term and not of a semi-permanent or seasonal nature.

When weather conditions such as snow and ice limit or prevent access to services, programs, and activities to or within a facility, access must be maintained to ensure that those programs are accessible. Maintenance of accessible features includes the removal of snow from accessible parking spaces; curb ramps, accessible routes of travel, and entrances. Although temporary interruptions in services due to bad weather are expected, alternate services must be provided if snow and ice cannot be cleared in a timely manner. Snow removal and removal of other obstructions within the accessible route of travel must be done to a minimum width of 36". Similarly, if an elevator, lift or similar accessible-related device is not working properly and is denying access, repairs must be made in a timely manner. In the interim, alternative services must be provided.

**Grafton Self-evaluation.** *During the facility assessments, a number of observations were made in direct violation of Title II. This included such as items as:*

- *Bathroom stall doors that no longer operated as self-closing.*
- *Missing and/or broken stair and ramp railings.*
- *Entry and exit doors with excessive operating forces and closing speeds.*
- *Routes of travel and walkways that were deteriorated and non compliant.*
- *Missing elements such as signage, bathroom stall door hardware, and sink plumbing protective equipment or wrap.*
- *Deteriorated cement and asphalt walkways.*
- *Deteriorated and rusted metal ramps.*
- *Accumulation of debris (sand, dirt, leaves) in sidewalks.*
- *Placement of portable signage in the accessible route of travel.*

### **Effective Communication, Auxiliary Aids and Services (ADA Title II – 28 CFR Part 35.160)**

Local governments must ensure effective communication with individuals with disabilities. To ensure that communications with individuals who have hearing, vision or speech impairments, municipal governments must provide appropriate auxiliary aids. The type of auxiliary aids or services necessary to ensure effective communication will vary according to the type of communication involved and the needs of the individual. Auxiliary aids include such services or devices as sign language interpreters, assistive listening headsets, television captioning and decoders, telecommunications devices for people who are deaf such as TDD's or video phones, use of 911 telephone interpreter service, readers, Brailled materials, documents on electronic format, audio recordings and large print materials. In addition,



telephone emergency services including 911 must provide direct access to individuals with speech and hearing impairments.

Municipal governments are not required to provide auxiliary aids or take any actions that would result in a fundamental alteration in the nature of a service, program, or activity or that will result in undue financial and administrative burdens. However, alternative auxiliary aids that do not result in a fundamental alteration or undue burden must be provided. For example, it is not necessary to provide sign language interpreters for all interactions with persons who are deaf or hard of hearing. Daily interaction may suffice through written notes or similar exchanges. However, public meetings, interrogations by local police officers, or similar technical interactions will most likely require interpreters or assistive listening systems. It is required that alternative auxiliary aids be available that does not result in financial or administrative burdens yet meet the needs of the disabled individual.

Website Accessibility (Web Content Accessibility Guidelines 2.0 AA or Section 508 Standards). Title II of the Americans with Disabilities Act requires that local governments ensure that, when viewed in their entirety, the programs, services, and activities offered are equally available to people with disabilities. Websites of local governments are considered to be a “program” and should be accessible to the standards of the Web Content Accessibility Guidelines 2.0 AA or Section 508 Standards.

Many people with disabilities use assistive technology that enables them to use computers. Some assistive technology involves separate computer programs or devices such as screen readers, text enlargement software, and computer programs that enable people to control the computer with their voice. Other assistive technology is built into computer operating systems. For example, basic accessibility features in computer operating systems enable some people with low vision to see computer displays by simply adjusting color schemes, contrast settings, and font sizes. Operating systems enable people with limited manual dexterity to move the mouse pointer using key strokes instead of a standard mouse.

Poorly designed websites can create unnecessary barriers for people with disabilities. The following are common problems and solutions in website accessibility.

a) Images Without Text Equivalents. Persons with low vision often use screen readers and refreshable Braille displays to access information on a webpage. These technologies read text, however, they cannot translate “images” into speech or Braille. Images includes photographs, charts, color-coded information or other graphic elements on a webpage. The solution to this problem would be to add a line of HTML code to provide text for each image and graphic so that the user can understand what the image is.

b) Documents Are Not Posted In an Accessible Format. Municipalities will often post documents on their websites using Portable Document Format (PDF). However, PDF documents, or those in other image based formats, are often not accessible to blind people who use screen readers and people with low vision who use text enlargement programs or different color and font settings to read computer displays. The solution would be to always provide documents in an alternative text-based format, such as HTML or RTF (Rich Text Format), in addition to PDF. Text-based formats are the most compatible with assistive technologies.

c) Specifying Colors and Font Sizes. Websites are often designed in a manner such that everything is exactly the same color, size and layout. But because of one’s disability, a person with low vision does not

see webpages the same as other people. Some see only small portions of a computer display at one time. Others cannot see text or images that are too small. Still others can only see website content if it appears in specific colors. For these reasons, many people with low vision use specific color and font settings when they access the Internet – settings that are often very different from those most people use. For example, many people with low vision need to use high contrast settings, such as bold white or yellow letters on a black background. Others need just the opposite – bold black text on a white or yellow background. And, many must use softer, more subtle color combinations. Users need to be able to manipulate color and font settings in their web browsers and operating systems in order to make pages readable. Some webpages, however, are designed so that changing the color and font settings is impossible. The solution is to design websites so they can be viewed with the color and font sizes set in users' web browsers and operating systems. Users with low vision must be able to specify the text and background colors as well as the font sizes needed to see webpage content.

d) Videos and Other Multimedia Lack Accessible Features. Due to increasing bandwidth and connection speeds, videos and other multimedia are becoming more common on the websites of local governments. Today, some government entities use their websites to post training videos for their employees, feature automated slide shows of recent public events, and offer video tours of local attractions. These and other types of multimedia can present two distinct problems for people with different disabilities. People who are deaf or hard of hearing can generally see the information presented on webpages. However, a deaf person or someone who is hard of hearing may not be able to hear the audio track of a video. On the other hand, persons who are blind or have low vision are frequently unable to see the video images but can hear the audio track. The solution is to incorporate features that make them accessible to everyone. Provide audio descriptions of images (including changes in setting, gestures, and other details) to make videos accessible to people who are blind or have low vision. Provide text captions synchronized with the video images to make videos and audio tracks accessible to people who are deaf or hard of hearing.

e) Other considerations when developing websites include:

- include a “skip navigation” link at the top of webpages that allows people who use screen readers to ignore navigation links and skip directly to webpage content;
- minimize blinking, flashing, or other distracting features;
- if they must be included, ensure that moving, blinking, or auto-updating objects or pages may be paused or stopped;
- design online forms to include descriptive HTML tags that provide persons with disabilities the information they need to complete and submit the forms;
- include visual notification and transcripts if sounds automatically play;
- provide a second, static copy of pages that are auto-refreshing or that require a timed-response;
- use titles, context, and other heading structures to help users navigate complex pages or elements (such as webpages that use frames).



**Grafton Self-evaluation.** *Auxiliary Aids and Services. Based on what was submitted in response to the survey as well as viewing policies and available materials, the Town has some systems in place to comply with this provision. For example Meeting Rooms A and F on the second floor in the Memorial Municipal Center have assistive listening devices available by asking the camera operator in the control booth and the operator will set up a device. The devices are kept in the control booths in both of the conference rooms.*

*“Auxiliary Aids available” were noted in the following returned departmental Self-Evaluation surveys:*

*DPW/Sewer – Town Social Media*

*Clerk’s Office – AutoMARK Voter Assist Terminal only*

*Police – TTY and American Sign Language (ASL) if needed*

*Town Administration/Board of Selectmen – TTY and assistive listening devices.*

*Assessor’s Office – TTY and Email*

*Town Library – “Communication to the public is primarily electronically via the Library website and social media. For the hearing impaired, we do have a sign language person in the community that we could call to interpret for us, if services are requested”.*

*However, it does not appear that information of this type is available as part of regular meeting notices and postings and who to contact to arrange for providing accommodations. The town must ensure that accessibility and accommodations language appear on all meeting notices including contact information and the advance timeframe required to arrange for disability related and accommodations requests. About half of the completed Self-Evaluation responders state that they have TTYs and a few stated they have assistive listening devices for meetings and American Sign Language (ASL) interpreters if needed. The remaining survey responses regarding assistive listening devices were either none, phone and email only. One responder indicated social media.*

**Town Website and Internet Accessibility.**

*Upon viewing the website, there appears to be areas where smaller size fonts are used, images and/or photographs lack text, and documents are presented in a pdf or scanned format. In most cases, color contrasts appear to be acceptable, but variation and standardization may be required for some users.*

*Based on the afore described “common website problems” and identified elements of Grafton’s website, the following should be put into place as feasible and appropriate:*

- 1. Establish, implement, and post online a policy that your webpages will be accessible and create a process for implementation.*
- 2. Ensure that all new and modified webpages and content are accessible.*
  - Check the HTML of all webpages. Make sure that accessible coding is used.*
  - Make sure that website is designed so it can be displayed using the color and font settings of each visitor’s browser and operating system.*

- *If images are used, including photos, graphics, scanned images, or image maps, make sure to include a text equivalent, by adding “alt” tags or long descriptions, for each.*
- *When online forms and tables are used, make those elements accessible by labeling each control (including buttons, check boxes, drop-down menus, and text fields) with a descriptive HTML tag.*
- *When posting documents on the website, always provide them in HTML or a text-based format (even if you are also providing them in another format, such as PDF).*

### **Emergency Preparedness, Evacuation Plans, and Emergency Shelters (ADA Title II)**

The Department of Justice views emergency preparedness plans as key components of a municipality’s responsibility to accessibility compliance. These plans and facilities should be adapted to address the needs of those with a disability and/or who require a reasonable accommodation.

**Grafton Self-evaluation.** *The Town of Grafton has CodeRed Community Notification Enrollment available on the front page of its website. It consists of an online form to fill in the appropriate information to be notified by the Town’s local emergency response team in the event of emergency situations or critical community alerts. Examples include: evacuation notices, bio-terrorism alerts, boil water notices, and missing child reports.*

*Otherwise the town does not appear to have any emergency preparedness information on its website such as the ability to sign up for Ready.gov. Ready.gov is a web based resource for citizens to use to educate and enable citizens to prepare for, respond to and mitigate emergencies, including natural and man-made disasters.*

*The only reference to Emergency Preparedness in the Fire Department’s webpage was a Pre Disaster Mitigation Plan public survey from The Central Massachusetts Regional Planning Commission (CMRPC) through a federal grant working in the community to create a Natural Hazards Pre Disaster Mitigation Plan. This survey ended November 20, 2015. The Police Department webpage only has “SeeClickFix” available to report non-emergency problems like potholes or abandoned vehicles. To report emergencies, citizens are to use 911.*

*Sample alert and notification services could include:*

*RAVE Alerting System offers the town the ability to notify and update its constituents within minutes of time-sensitive situations. This system allows us to communicate with concise and timely information while providing information and reassurance to residents, businesses and media.*

*The AMBER Alert™ Program is a voluntary partnership between law-enforcement agencies, broadcasters, transportation agencies, and the wireless industry, to activate an urgent bulletin in the most serious child-abduction cases. The goal of an AMBER Alert is to instantly galvanize*

*the entire community to assist in the search for and the safe recovery of a child.*

*Smart911 is a free service that allows citizens across the U.S. to create a Safety Profile for their household that includes any information they want 9-1-1 to have in the event of an emergency. Then, when anyone in that household dials 9-1-1 from a phone associated with their Safety Profile, their profile is immediately displayed to the 9-1-1 call taker providing additional information that can be used to facilitate the proper response to the proper location. At a time when seconds count, being about to provide 9-1-1 with all details that could impact response the second an emergency call is placed could be the difference between life and death.*

*The Town should develop emergency preparedness plans which include accessibility compliance. Existing plans and facilities should be adapted to address the needs of those with a disability and/or who require a reasonable accommodation.*

### **Polling Places**

Under the ADA, Help America Vote Act, Voting Accessibility for the Elderly and Handicapped Act, and Massachusetts General Laws, polling places are required to be accessible to persons with disabilities. This includes site access, parking, entrances, interior access, and voting equipment. In addition, registration and voting aids for the disabled and elderly are required, including information by alternative accessible means.

The Elections Division of the Secretary of the Commonwealth of Massachusetts (Elections Division) office works with each municipal clerk to ensure polling places are accessible by meeting state (and federal) regulations.

All polling locations in Massachusetts are required to be accessible and must provide access on a permanent or temporary basis on an Election Day. Voting assistance and absentee voting offer options that persons with disabilities may use to vote, but are not considered substitutes to actual accessibility to the voting location.

Both federal law and state requirements mandate that voting systems be equipped for voters with disabilities allowing such voters to have the same opportunity to vote privately and independently. It is required that every precinct must have at least one accessible voting machine available.

According to the Elections Division, there is at least one accessible marking unit in every polling place in Massachusetts. The “AutoMARK Voter Assist Terminals” are marking devices that use audio cue capacity for visually impaired voters. The AutoMARK also has a feature that will greatly magnify the ballot or display the ballot high-contrast for voters that have limited visual impairment. The AutoMARK can also produce an oral report to the voter as the choices selected prior to the voter printing the ballot.

**Grafton Self-evaluation.** *Town poll voting is held at the Grafton Middle School (22 Providence Road) for precincts 1, 2 and 3 and at the Millbury Street Elementary School (105 Millbury Street) for precincts 4 and 5. Upon review of the Town’s website, there is no information posted either on the Town Clerk page or Board of Registrars Page on voting for those with a disability.*

*The Director of Buildings and Grounds indicated where accessible parking is set aside at both schools for voters with mobility related disabilities. A temporary sign is placed at the Middle School parking lot pointing to the cluster of accessible parking spaces located next to a curb*

ramp that leads to the school building. Once inside the building, there is interior signage leading to the gymnasium where the voting booths are set up. The accessible parking at the Grafton Middle School Gymnasium area features access aisles and permanently mounted above-ground signage.

The Millbury Street Elementary School directs voters with disabilities to the back of the building using an electronic directional sign from the Highway Department. This designated accessible parking area provides direct access to the Gymnasium where the voting takes place. These parking spaces are technically non-compliant due to lack of access aisles and permanently mounted above-ground signage. They just have the Universal Symbol of Access painted on the ground. However, this area is only used when voting takes place because it is a much shorter distance to the gymnasium as opposed to coming into the building from the front and having to traverse the entire school building.

The Town Clerk confirmed that the AutoMARK Voter Assist Terminal, an optical scan ballot marker designed for use by people who are unable to personally mark an optical scan ballot due to physical impairments or language barriers is placed where the display screen is not visible to the voting public. This is extremely important because there are numerous cases where the AutoMARK is placed alongside the other voting booths and the screen is in full view of voters passing by which violates voter privacy. Below is a representation of the AutoMARK terminal.



## VII. ADA TRANSITION PLAN

In accordance with the ADA Standards and MA 521 CMR, an assessment of the Town of Grafton's public facilities inclusive of public buildings, active and passive recreation facilities, and schools was conducted to identify physical barriers to programs and services. This assessment or "transition plan" includes the following elements, which fulfill the requirements for the preparation of a transition plan:

- identification of physical obstacles in the building or facility that limit the accessibility of its programs or activities to persons with disabilities, and
- 2010 ADAAG and MAAB 521 CMR citation, and
- a description of methods or type of action to be taken to eliminate identified obstacles, and
- priority of removal of barrier, and
- feasibility of removal of barrier, and
- establishment of a recommended completion date to achieve accessibility, and
- general cost parameters for each action to be taken, and
- responsible party for implementation.

### **Limitations of the Transition Plan and Compliance**

The primary obligation under Title II of the ADA is to ensure that programs and services are equally available to persons with disabilities. Municipalities are required to adhere to the 2010 Standards for Accessible Design in new construction and alterations. Programs must be relocated or access provided in inaccessible existing facilities as of the effective date of the ADA or January 26, 1992. When existing facilities comply with the 1991 Standards, there is no requirement to update to the current 2010 Standards. However, if conditions in existing facilities do not adhere to the original Standards, then the 2010 Standards must be followed.

**ADA Safe Harbor:** Elements in facilities built or altered before March 15, 2012 that comply with the 1991 ADA Standards for Accessible Design (1991 Standards) are not required to be modified to specifications in the 2010 Standards. For example, the 1991 Standards allow the maximum side reach of a control or dispenser to be 54 inches. The 2010 Standards lowered that side reach range to 48 inches maximum. If a control or dispenser was installed prior to March 15, 2012 with its highest operating part at 54 inches, that control or dispenser does not need to be lowered to 48 inches. Since the dispenser complies with the 1991 Standards, that Standard provides a "safe harbor".

**Tolerances:** Both the 2010 ADA Standards and 521 CMR allow for "tolerances as follows:

#### **2010 ADA Standards**

All dimensions are subject to conventional industry tolerances except where the requirement is stated as a range with specific minimum and maximum end points.

#### **521 CMR**

- Dimensions between zero and two inches, (0" and 2") inclusive, shall have a maximum tolerance of plus or minus one-eighth inch (1/8").
- Dimensions more than two inches and less than 36 inches (>2" and <36") shall have a maximum tolerance of plus or minus one-half inch (1/2").

- Dimensions 36 inches or greater (36" or >) shall have a maximum tolerance of plus or minus one inch (1")
- Slopes may not exceed maximums. Slopes shall be measured in two-foot increments. Tolerances do not apply to minimums or maximums.

For the purposes of this plan, unless specifically noted, facility assessments are based on the 2010 ADA Standards and 521 CMR (Massachusetts Architectural Access Board MGL. C. 22 s13A), whichever is more stringent.

The plan does not address what is accessible, but rather obstructions to mobility. Fieldwork was performed July and August, 2018. Although general recommendations are made as corrective actions to eliminate identified obstacles, it is expected that the town will be solely responsible for designing the specific construction solution in accordance with 521 CMR: Architectural Access Board Regulations or the 2010 ADA Standards for Accessible Design, whichever is appropriate.

As part of the transition plan assessment, deficiencies or limitations to access were identified at each location. The actions noted in this plan to be taken in removing obstacles to mobility are descriptive and are not intended to be construction specifications. The specific construction action can vary substantially depending on desirability and type of materials. In addition, historically significant properties can result in additional cost due to more architecturally sensitive construction alternatives (historic properties discussed elsewhere in this Plan). As a result, the costs can vary accordingly. The party responsible for implementing the identified action will be responsible for working with the town's building inspector and a design professional, if necessary, so as to ensure compliance with 521 CMR and/or the ADA Standards. Where appropriate, due to historic considerations, building configuration, or extent of use, a combination of programmatic solutions and construction alternatives are provided. Such measures are in full compliance with Title II of the ADA. In circumstances where there are differences in the compliance requirements between 521 CMR and the ADAAG, the stricter or more encompassing standard shall apply.

The Department of Justice issued 1991 Standards for Accessible Design to address physical barriers to facilities and transportation. There were technical amendments to these standards in 1994 followed by more substantive amendments in 2010 (2010 ADA Standards for Accessible Design). These 2010 Standards revised policy requirements for certain areas such as service animals. The 2010 Standards also addressed certain physical components including assembly seating, the establishment of construction tolerances for certain items and formalized standards for docks, fields, pools, and other recreational facilities.

As is the circumstance with 521 CMR of the Massachusetts State Building Code, under the Federal ADA, construction modifications for accessibility compliance is not required unless triggered by renovation and/or new construction. Municipalities must still ensure that individuals are not excluded from programs and services because buildings or facilities are inaccessible. This can be accomplished through relocating a program or service to an accessible location or other means of reasonable accommodation. For the purposes of this Transition Plan, the higher standard of compliance will be used for the purpose

of identifying obstacles and determining cost, however, descriptive alternatives will also be provided in the narrative.

### **Use of the Transition Plan**

This plan is intended to be a working document. If a barrier was overlooked it can easily be added to the plan. Programs and services can be modified and adapted over time as needed. Similarly, policies and procedures can be modified and adopted to reflect current legislative requirements. Actual construction methods to arrive at a solution for an identified problem may vary depending on final plans and specifications. The town should use this plan as a guide for compliance and modify it as needed without altering its initial intent and efforts of compliance. In addition, the inventory of barriers can be used in concert with the town's capital budget process to assist in the determination of how and when to proceed with the many suggested improvements.

The plan provides a description of the obstacle which limits mobility or access, 2010 ADA Standards citation reference, MA 521 CMR citation reference, the type of action required to be taken for compliance, the priority for the action, the feasibility of undertaking the action, the timeframe for completion, a representative photo, and a general parameter of cost.

### **Priority(P)**

Each architectural barrier has also been ranked according to the priority of removal based upon the type of access that is affected. The priority rankings (#1 being the highest priority and #4 being the lesser priority) are determined by the ADA and are defined as follows:

<u>Priority</u>	<u>Description</u>
1	Accessible approach and entrance
2	Access to goods and services
3	Access to public toilet rooms
4	Access to other items (ie – water fountains, public telephones, etc.)

### **Feasibility(F)**

Each architectural barrier has been ranked according to the feasibility of removing that particular barrier. The feasibility rankings are somewhat subjective and are based on a perceived degree of difficulty or skill level required to remove an architectural barrier. These rankings are as follows:

<u>Ranking</u>	<u>Description</u>
1	Can be easily undertaken (i.e. move furniture, put sign on a wall)
2	Can be undertaken by maintenance staff, DPW, etc. (i.e. install post and sign, move dispensers, adjust door closer, change door hardware)
3	Minor modifications which require skilled or specialized work (build ramp, alarm installation, sink/toilet installation, etc.)
4	Major modifications which require skilled or specialized work (structural changes, building additions, elevators/lifts, etc.)

### **Time-frame(TF)**

A recommended time-frame for removing the architectural barrier is provided as follows:

<u>Time-frame</u>	<u>Description</u>
I	Immediate Term (2020-2021)
N	Near Term (2022-2025)
L	Long Term (2026-2029)

## **Costs**

Cost estimates are based on recent projects of similar nature, unit quantity pricing (where appropriate), and R.S. Means Company, Inc. ADA Compliance Pricing Guide 2<sup>nd</sup> Edition and updated for current pricing. Cost estimates are also based on the type and complexity of work. It is being assumed that simple changes (Feasibility ranking of 1 or 2) will be made through the use of town personnel (custodial, DPW, etc.). More complex construction or those projects requiring specialized skills (Feasibility ranking of 3 or 4), would involve private contractors and include labor, overhead, and profit.

## **List of Buildings and Facilities**

**Municipal Buildings:** Municipal Center/Administration, Municipal Center/Senior Center/Veteran's Hall, South Grafton Community Center, Nelson Library, Police Department, Historical Commission Building, Fire Station #1 (Main – 26 Upton Street), Fire Station #2 (2 Mill Street), and Fire Station #3 (92 Main Street).

**Recreational and Other Public Facilities:** Mill Villages Park, Brush Dump Facility, Perry Hill Park, Airport Park, Norcross Park, Nelson Park, Brookmeadow Park, Riverview Park, Fisher Park/Ferry Street Park, Silver Lake Beach, Town Common, and Town Common Area and North Main Street Sidewalks and Curb Ramps.

## **Abbreviations**

a.f.f.	above finish floor	c.f.s	clear floor space
s/b	should be	r.s	running slope
>	greater than	c.s.	cross slope
<	less than		



## **VIII. MUNICIPAL BUILDINGS ASSESSMENTS**

Municipal Center/Administration

Municipal Center/Senior Center/Veteran's Hall

South Grafton Community Center

Nelson Library

Police Department

Historical Commission Building

Fire Station #1 (Main – 26 Upton Street)

Fire Station #2 (2 Mill Street)

Fire Station #3 (92 Main Street)

## **MUNICIPAL CENTER - GRAFTON TOWN OFFICES**

**Function and Description of Facility and Programs:** Originally built in 1957 as a school building, the building now serves as the town's primary administration building for general governmental services including the school department's administrative offices. The building consists of 2 levels and totals roughly 38,650 s.f.



**Responsible Party:** Board of Selectmen

**General Description or Obstacle Which Limits Mobility or Access:** Both “accessible” entrances at the building rear have stairs with railings on one side only. The entrance near the vault lacks van accessible signage. The accessible signage at the northern entrance is too low. The approach to the northern most accessible entrance closest to the elevator has running slopes that vary up to nearly 7.0% which will require railings. In addition, the landing is only 4' x 4' and does not meet the required 5' x 5' for a ramp at the directional change. Most of the exterior and interior doors (when applicable) exceed the maximum operating force (15 lbs. – exterior; 5 lbs. – interior) and do not meet the minimum closing speed of 6 seconds. Interior stair railings are too wide, are not oval or round, and extensions are not provided at the top and bottom of the stairs. Nearly all interior doors lack tactile signage and have non-compliant knob-style hardware. The hallway drinking fountains are not “high-low”. There are a number of protruding objects in the hallways (dispensers, TV monitors, fire extinguishers) which exceed that allowed. Most glass panels on doors/entries exceed the maximum height under the ADAAG. Some light switches and controls exceed the maximum height for a compliant reach range, inclusive of allowed industry tolerances. Some of the office areas do not have compliant clear widths for maneuverability due to placement of desks, cabinets or other items. The designated “accessible” Level 1 and Level 2 bathrooms do not fully adhere to various setback, placement and height requirements and have other areas of non-compliance. The school department employee lounge has a number of items (phone, towel dispenser, controls) that exceed the maximum reach range. In addition, the guard for sink plumbing is not in place. Two vaults in the Town Clerk's Office have reduced maneuverability, changes

in level surface, and excessive operating force to open the vault doors. As these areas are not open to the public, modifications would only be triggered through a reasonable accommodations request. Similarly, a sink in Room #106 does not appear to be for general public use. Accessible modifications would be triggered through a reasonable accommodations request.

### **Municipal Center/Town Offices Accessibility Assessment**

<b><u>General Description of Obstacle</u></b>	<b><u>2010 ADAAG</u></b>	<b><u>MAAB 521 CMR</u></b>	<b><u>Type of Action to be Taken</u></b>	<b><u>P</u></b>	<b><u>F</u></b>	<b><u>TF</u></b>	<b><u>Cost Estimate</u></b>
<b><u>Parking</u></b> Accessible parking for the town office building is located at the rear of the building near the vault (2 spaces) and near the elevator (1 space). Although widths are adequate, none of the spaces are designated as van accessible. The signage for the space near the elevator is roughly 4" too low. See <a href="#">Photo Town Office 1</a> .	502.6	23.6	Signage must be reset at the accessible space closest to the elevator such that the signage height is a minimum of 60" a.f.f. at the bottom (2010 ADAAG Standards) and a maximum of 96" at the top (MAAB 521 CMR. Additional van accessible signage must be provided for the space closest to the elevator and for one space near the vault.	1	2	I	\$50
<b><u>Accessible Route to Building from Rear Parking Lot</u></b>  <u>Entrance Closest to Elevator</u> The lower leg of the accessible route (concrete walkway) from the parking lot to the building entrance has running slopes of 6.5% to 7.1% which far exceeds the maximum of 5% for a walkway.  <u>Entrance Closest to Elevator and Entrance Near Vault</u> Railings exist on only one side on the stairs. See <a href="#">Photo Town Office 2</a> .	403.3	22.3	Option 1: Install ramp railings on both sides of the lower segment in accordance with 504, 505 (ADAAG) and 27.4 (521 CMR). The landing between ramp segments at the directional change will need to be modified for a 5' x 5' landing as opposed to the current 4' x 4' landing,  Option 2: Remove 4 existing lower concrete pads and replace with pads that comply with maximum 5.0% running slope for a walkway.	1	3	I	\$5,000
	505.2	27.4.1	Install stair railings such that the top of the railing is 34" to 38" a.f.f.; circular in x-section; 1¼" to 2" in outside diameter; and with a 12" extension (as feasible) parallel to the ground at the top and at the bottom a slope distance of one tread then 12" parallel to the ground..	1	3	I	\$1,350+
<b><u>Entryway Doors Closest to Elevator</u></b> The double doors are each only 31½" wide providing a less than 30" clear width which is 2" too narrow.  Entry threshold has a 1" interior bevel which is ½" too high. See <a href="#">Photo Town Office 3</a> .	404.2	26	Remove existing doors and replace with a glass commercial entrance with one 36" wide door with an automatic door opening system.	1	3	N	\$10K+
	404.2.5	26.10	Modify threshold at time of new entrance installation.	1	3	N	Included in above
<b><u>Exterior Doors</u></b> Entrance and egress doors without automatic door openers do not fully comply with the maximum allowed operating force for an exterior door (15 lbs.) and minimum closing speed requirement of 6 seconds under 521 CMR. Assessments ranged from 3 seconds closing speed to 20 lbs. operating force.	404.2.8 404.2.9	26.8 26.9	Adjust door closers such that push/pull force does not exceed 15 lbs for an exterior door, and door closing speed is at least 6 seconds.	1	2	I	Up to \$300+

Front entrance thresholds are 1" high beveled and ¼" high unbeveled.	404.2.5	26.10	Modify thresholds to comply with maximum height of ½", beveled on both sides and no greater than a 1:2 slope.	1	3	N	Up to \$500+
<b>Interior Doors</b> The following interior doors do not fully comply with the maximum allowed operating force for an interior door (5 lbs.) and minimum closing speed requirement of 6 seconds under 521 CMR. <ul style="list-style-type: none"> <li>Level 1 and Level 2 hallway double doors.</li> <li>Level 1 men's and women's bathrooms.</li> <li>Rooms #223, 221, 214, 216, 222.2 – 222.3, 221.1.</li> </ul>	404.2.8 404.2.9	26.8 26.9	Adjust door closers such that push/pull force does not exceed 5 lbs and door closing speed is at least 6 seconds.	4	2	I	Up to \$350
<b>Non-compliant Interior Door Widths</b> With the exception of the L2 hallway double doors to the School Department, each door is only 31½" wide providing a less than 30" clear width, which is 2" too narrow. See <a href="#">Photo Town Office 4.</a>	404.2	26	Option #1: Keep doors in an open fixed position.  Option #2: Modify existing doors to provide one 36" wide door.	2 2	1 3	I L	\$0  Up to \$25,000
<b>Interior Stair Railings</b> Stair railings are non-compliant as they do not have extensions at the top and bottom (exception is mid building staircase which has continuous railings at the mid-point landing) and are non-compliant in shape and size for the interior railing. See <a href="#">Photos Town Office 5 and 6.</a>	505	27.4	Seek a variance to maintain the interior existing railings. Add extensions to the existing wall-mounted pipe railings <u>or</u> install compliant continuous railings on the wall side of the stairways at a height of 34" – 38" to the top of the handrails, round or oval in x-section and between 1½" – 2" in outside diameter, and with extensions at the top 12" parallel to the floor and at the bottom the slope distance of one tread then 12" parallel to the floor.	2	3	N	\$2,500 - \$9,000
<b>Drinking Fountain (1<sup>st</sup> and 2<sup>nd</sup> Level).</b> The drinking fountains are non-compliant as they are not "hi-low" fountains.  See <a href="#">Photo Town Office 7.</a>	211	36.1.1	Option #1 – Discontinue use of the existing drinking fountains.  Option #2 – remove the existing drinking fountains and replace with "hi-low" drinking fountains. The drinking fountains must comply as follows:  Protruding objects compliance of no > 4" protrusion between 27" and 80" a.f.f. (307); 30"x48" clear space requirement (305), and knee/toe clearance (306). Knee clearance is 9" to 27" a.f.f.; 25" deep max. at 9" a.f.f. or 11" deep min at 9" a.f.f. and 8" deep min at 27" a.f.f. Width of knee clearance s/b 30" wide min (306.3). Toe clearance as part of c.f.s. 17" min – 25" max, 9" high a.f.f., 30" wide (306.2). The spout s/b 15" min from wall and 5" max from the front edge of the unit (602.5). Flow of water 4" high min and spout located max 5" from front (602.6). The spout height s/b 36" max. a.f.f. for "low" and 38" min a.f.f. to 43" max a.f.f. for "high". The controls s/b operable w/one fist; no > 5 lbs force (309.4).	4	3	N	\$0 to \$5,000
<b>Hallway Protruding Objects and Headroom</b> The following are protruding objects as they extend more than 4" into the accessible route of travel between a height of 27" and 80" a.f.f. or have vertical clearance reduced to less than 80":	307.2	20.6.1		2	1	I	\$0

<ul style="list-style-type: none"> <li>• Soap dispensers near Rooms # 105, 110, 102, 115, 139, 213, 202 and Level 1 hallway dispenser.</li> <li>• Level 1 wall mounted TV monitors near Town Clerk's Office.</li> <li>• Level 1 fire extinguishers (3) and Level 2 fire extinguishers.</li> </ul> <p>See Photos Town Office 8 and 9.</p>			<ul style="list-style-type: none"> <li>• Relocate or place a fixed object under the dispensers.</li> <li>• Adjust or raise the height of the monitors so the base is at least 80" a.f.f. or place a fixed object below the monitors.</li> <li>• Place a fixed object under the fire extinguishers or relocate.</li> </ul>				
<p><b>Hallway Door Signage</b></p> <p>Tactile designation signage is not provided at rooms, offices and storage areas/closets and in some instances, not provided on the latch side of the door. Signage is required at a minimum at the following locations:</p> <p>Level 1 – Door under stairs near elevator; Rooms # 106, 107, 108 (2), 109, 105, 104, 110, 103, 100.1, 114.1, 102, 101, 114, 115, 116, 140, 117, 118, 119 (3), 120, 139.</p> <p>Level 2 – Rooms # 206 (2), 204 (2), 207, 203, 208, 202, 200.1, 212 (2), 201 (2), 224, 221, 221.1, 200.2 (2), 220 (signage not on latch side).</p>	703	41.1	Install accessible compliant designation on the latch side of each door (where allowable) with appropriate finish and contrast and character height and proportions, raised and brailled characters should also be included. Tactile characters on signs s/b 48" min. a.f.f.. from baseline of lowest character and 60" max. a.f.f. to baseline of highest character. Characters must meet the ADA Standards for character height, finish and contrast, accompanied by Grade 2 Braille (703 ADA Standards).	2	2	I	Up to \$1,200
<p><b>Hallway Door Hardware</b></p> <p>Non-compliant knob style hardware exists on most doors throughout the town office building. Compliant hardware is required at a minimum at the following locations:</p> <p>Level 1 – Door under stairs near elevator; Rooms # 106, 104, 103, 100.1, 114.1, 102, 101, 114, 115, 116, 140, 117, 119 (2), 120, 139.</p> <p>Level 2 – Rooms # 206 (2), 204 (2), 207, 203, 208, 202, 200.1, 212 (2), 201 (2), 224, 200.2 (2).</p>	404.2	26.11	Replace knob-style hardware with compliant door hardware that is easy to operate with one hand and that does not require tight grasping, tight pinching of the wrist to operate.	2	2	N	Up to \$2,500
<p><b>Hallway Doors with Glass Panels</b></p> <p>Interior doors have glass panes that exceed the maximum viewing height of 43" as follows:</p> <p>Level 1 - Double Doors (3 sets), Main Entrance (4), 108 (2), 105, 104, 110, 103, 102, 101, 114 (3), 115 (2), 116, 117, 140, 139, Collector's office.</p> <p>Level 2 - Double doors (3 sets), Conference Room E, 204, 207, 203, 208, 202, 201, 212, Conference Room F, 224, School Payroll, School Maintenance. See Photo Town Office 10.</p>	404.2.11	NA	<p>Doors, gates, and side lights adjacent to doors or gates, containing panels that permit viewing through the panels shall have the bottom of at least one panel located 43 inches maximum a.f.f. Modify doors/panels to comply with maximum height restriction.</p> <p>Seek variance on main entrance interior original doors due to uniqueness of glass pattern. Replace others as required over time based on funds and necessity.</p>	4	3	L	\$0 to TBD

<b>Hallway Controls, Switches, and Outlets</b> Four (4) Level 1 Hallway light switches. Two (2) Level 2 Hallway light switches, and two (2) Level 2 Hallway outlets exceed the maximum reach range under the 2010 ADA Standards, inclusive of allowed tolerances.	308.2 308.3	6.5 6.6	Lower light switches and outlets to no more than 48" a.f.f.	4	3	L	Up to \$3,000
<b>Room Stair Railings</b> The CATV Room in #108 has stair railings on only one side of the stairs to the room. Stairs to Room 101 lack railings on both sides. See Photos Town Office 11 and 12.	505	27.4	Install compliant continuous railings at a height of 34" – 38" to the top of the handrails, round or oval in x-section and between 1¼" – 2" in outside diameter, and with extensions at the top 12" parallel to the floor and at the bottom the slope distance of one tread then 12" parallel to the floor (bottom extensions may not be allowable in Room 101 due to location of adjacent door).	4	3	N	Up to \$750
<b>Counter Heights</b> The office service counters in Health (#105) exceed the maximum height allowed by 1½" which is also outside allowed tolerances.	904.4	7.2	Modify a segment of the counter so that it does not exceed 36" a.f.f. in height with a minimum of 36" clear width.	2	3	N	Up to \$350

#### Rooms and Offices

Room #	Light Switch > 48"	Controls > 48"	Knob-style Hardware	No Tactile Signage	Inadequate Clear Width	Gate Closing Speed
101-102	1	3		4		4 seconds
103	3	2	3	3		
104	1	2	1	1		
105	1	1	1	1		2 - 3 seconds
106	1		1	1		
108		2		4		
109		2		2		
110	1	2		2	21½" interior	2 - 3 seconds
114	1		1	3		
115	3	2	3	7	29½" entry	
117		1			29" interior to sink	
140		1				
139		2	1	1		3 seconds
141-141.1	1	3	1	1		
204		1	1	1		
203	1	2	2	2		
202	1	1	2	2		
Conf. F	2	2	3	4		
224	2	1	1	1		
212	1	2	1	1		
207-208		3	2	3	28" interior	
Conf. E	1	2	3	3		
223		2				
222.2-222.3		3				
221.2		1		1		
221.1		1; phone				
220		2	4	1 Not on latch side; 4		
216		2				
214		3				
213		2				
Priority	4	4	4	4	2	2
Feasibility	3	3	2	2	3	2
Time Frame	L	L	N	N	L	N
Total Estimated Cost	Up to \$10,000	Up to \$22,875	Up to \$2,275	Up to \$1,475	\$0 to \$1,500	\$0

<u>General Description of Obstacle</u>	<u>2010 ADAAG</u>	<u>MAAB 521 CMR</u>	<u>Type of Action to be Taken</u>	<u>P</u>	<u>F</u>	<u>TF</u>	<u>Cost Estimate</u>
<b>Level 1 Employee Lounge (#117)</b> The clear width to the sink area is non-compliant and needs widening (included in above). The sink counter is 2" too high (804.3.2; 32.2), there is no knee/toe clearance beneath the sink (306; 32.6), and the cabinets have knob-style hardware (309; 32.5). Both the soap and towel dispenser exceed the maximum reach range for a forward reach over an obstruction (counter) 308.2; 308.3; 6.5, 6.6. See <a href="#">Photo Town Office 13</a> .	804.3.2 306 309 308.2 308.3	32.2 32.6 32.5 6.5 6.6	Modify the counter and sink so that it is no more than 34" a.f.f. and provides a minimum of 27" knee clearance with guarded, wrapped, or insulated piping. Cabinet hardware should be operable with a closed fist. Lower the dispensers to no more than 44" a.f.f. and within reach when using the sink	4	3	L	Up to \$1,000
<b>Level 2 Employee Lounge (#221.1)</b> The sink guard for the piping is not in place (606.5; 30.9.5). The towel dispenser is 51" a.f.f. See <a href="#">Photo Town Office 14</a> .	606.5 308.2 308.3	30.9.5 6.5 6.6	Re-secure the guard panel and lower the dispenser to no more than 48" a.f.f.	4	2	I	\$0
<b>Level 1 Men's Bathroom</b>  The wall mounted mirror is 11½" too high.  The water closet stall door lacks an interior pull device, has a non-compliant closing mechanism, and is not self-closing.  The grab bars are mounted 2" to 5" too low and are smooth and not etched or roughened.  The toilet paper dispenser is 0" o.c. from the front of the water closet and is located over the grab bars.  The water closet flush control is not on the open or wide side.  The urinal is 6½" too high.  The sink piping is not wrapped, insulated, or guarded.  The sink corner serves as a protruding object as it is > 27" a.f.f. and protrudes more than 4" into the accessible route.  See <a href="#">Photos Town Office 15 and 16</a> .	603.3  604.8.1 404.2.7  609.4  604.7 309.4  604.6  605.2  606.5  307.2	30.11  30.6.1 39.5  30.8.2 30.8.4  30.7.6 30.8.5  30.7.5  30.10.1  30.9.5  20.6.1	Lower mirror such that the bottom of the mirror (reflecting surface) is no greater than 40" a.f.f.  Modify or replace hinge so that it is self-closing. Install a pull device on the interior stall door at a height of no greater than 48" a.f.f. Replace the closing mechanism with one that can be operable with a closed fist and does not require pinching or twisting.  Replace the grab bars with 42" long bars that are non-rusting, acid-etched, or roughened. The grab bars should be mounted such that the top of the gripping surface is 33" to 36" a.f.f.  Toilet paper dispenser s/b 7" minimum and 9" maximum in front of the water closet measured to the centerline of the dispenser. The dispenser s/b a minimum of 24" a.f.f. and not mounted above the grab bars under 521 CMR.  Relocate flush control so that it is on the wide or approach side or replace with an automatic flush control.  Install a urinal with an elongated rim at a height of no more than 17" a.f.f.  Wrap and/or insulate piping.  Install a wing wall at the end of the sink for cane detection.	3  3  3  3  3  3	2  2  2  2  3  3	I  I  I  I  I  I	\$25  \$100  \$350  \$50  Up to \$750  Up to \$500+  \$25  \$100
<b>Level 1 Women's Bathroom</b>  The water closet stall door lacks an interior pull device and is not self-closing.	604.8.1	30.6.1	Modify or replace hinge so that it is self-closing. Install a pull device on the interior stall door at a height of no greater than 48" a.f.f.	3	2	I	\$25

The grab bars are mounted 1¼" to 2" too low and are smooth and not etched or roughened.	609.4	30.8.2 30.8.4	Replace the grab bars with 42" long bars that are non-rusting, acid-etched, or roughened. The grab bars should be mounted such that the top of the gripping surface is 33" to 36" a.f.f.	3	2	I	\$350
The toilet paper dispenser is 0" o.c. from the front of the water closet and is located over the grab bars. The sanitary dispenser is also located over the grab bars.	604.7 309.4	30.7.6 30.8.5	Toilet paper dispenser s/b 7" minimum and 9" maximum in front of the water closet measured to the centerline of the dispenser. The dispenser s/b a minimum of 24" a.f.f. and not mounted above the grab bars under 521 CMR. Relocate sanitary dispenser.	3	2	I	\$0
The water closet flush control is not on the open or wide side.	604.6	30.7.5	Relocate flush control so that it is on the wide or approach side or replace with an automatic flush control. Wrap and/or insulate piping.	3	3	I	Up to \$750
The sink piping is not wrapped, insulated, or guarded.	606.5	30.9.5	Wrap and/or insulate piping.	3	2	I	\$25
The 48" a.f.f. towel dispenser serves as a protruding object as it is > 27" a.f.f. and protrudes more than 10" into the accessible route.	307.2	20.6.1	Relocate the towel dispenser.	3	2	I	\$0
The stall door coat hook is 15" too high.  See Photos Town Office 17 and 18.	308.2 308.3	30.6.1	Lower coat hook to no more than 48" a.f.f.	3	2	I	\$0
<b><u>Level 2 Men's Bathroom</u></b>							
The towel dispenser is 3" too high.	308.2 308.3	30.12	Lower the dispenser so that it is no greater than 42" a.f.f. under 521 CMR.	3	2	I	\$0
The water closet stall door lacks an interior pull device.	604.8.1	30.6.1	Install a pull device on the interior stall door at a height of no greater than 48" a.f.f.	3	2	I	\$10
The stall door coat hook is 6" too high.	308.2 308.3	30.6.1	Lower coat hook to no more than 48" a.f.f. under the ADAAG.	3	2	I	\$0
The rear grab bar is 6" too far from the interior corner.	604.5	30.8.1	Move rear grab bar so that it is no more than 6" from the interior corner.	3	2	I	\$0
The toilet paper dispenser is 0" o.c. from the front of the water closet and is located over the grab bars.	604.7 309.4	30.7.6 30.8.5	Toilet paper dispenser s/b 7" minimum and 9" maximum in front of the water closet measured to the centerline of the dispenser. The dispenser s/b a minimum of 24" a.f.f. and not mounted above the grab bars under 521 CMR.	3	2	I	\$0
The sink piping is not fully wrapped, insulated, or guarded.	606.5	30.9.5	Wrap and/or insulate piping.	3	2	I	\$25
The metered faucet for the sink stays open for only 3 seconds.	606.4	30.9.6	Adjust metered faucet so that it stays open for at least 10 seconds.	3	3	I	\$75
<b><u>Level 2 Women's Bathroom</u></b>							
The first towel dispenser serves as a protruding object as it extends more than 4" into the accessible route of travel between a height of 27" and 80" a.f.f.	30.7.2	20.6.1	Relocate the dispenser.	3	2	I	\$0
The towel dispenser closest to the sink is 3½" too high under 521 CMR.	308.2 308.3	30.12	Lower dispenser to no more than 42" a.f.f.	3	2	I	\$0



The water closet stall door lacks an interior pull device and the door is not self-closing.	604.8.2	30.6.1	Modify or replace hinge so that it is self-closing. Install a pull device on the interior stall door at a height of no greater than 48" a.f.f.	3	2	I	\$85
The stall door coat hook is 6" too high.	308.2 308.3	30.6.1	Lower coat hook to no more than 48" a.f.f. under the ADAAG.	3	2	I	\$0
The rear grab bar is 6" too far from the interior corner.	604.5	30.8.1	Move rear grab bar so that it is no more than 6" from the interior corner.	3	2	I	\$0
The toilet paper dispenser is 0" o.c. from the front of the water closet and is located over the grab bars.	604.7 309.4	30.7.6 30.8.5	Toilet paper dispenser s/b 7" minimum and 9" maximum in front of the water closet measured to the centerline of the dispenser. The dispenser s/b a minimum of 24" a.f.f. and not mounted above the grab bars under 521 CMR.	3	2	I	\$0
The metered faucet for the sink stays open for only 2 seconds.	606.4	30.9.6	Adjust metered faucet so that it stays open for at least 10 seconds.	3	3	I	\$75
The water closet flush control is not on the open or wide side.	604.6	30.7.5	Relocate flush control so that it is on the wide or approach side or replace with an automatic flush control.	3	3	I	\$750

Total up to \$109,035+

### **Municipal Center/Town Offices Accessibility Assessment Photos**



Photo Town Office 1



Photo Town Office 2



Photo Town Office 3



Photo Town Office 4



Photo Town Office 5

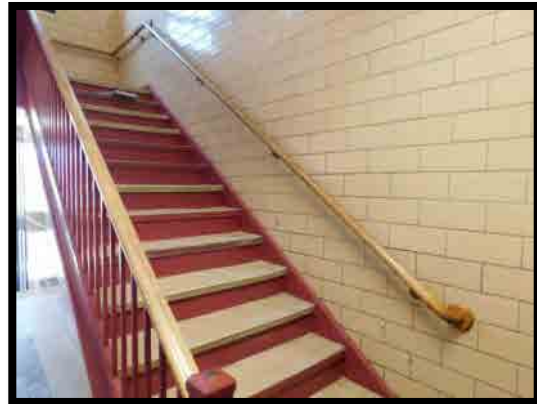


Photo Town Office 6



Photo Town Office 7



Photo Town Office 8



Photo Town Office 9



Photo Town Office 10



Photo Town Office 11



Photo Town Office 12



Photo Town Office 13



Photo Town Office 14

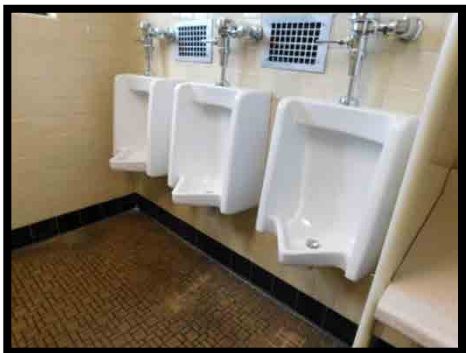


Photo Town Office 15



Photo Town Office 16



Photo Town Office 17

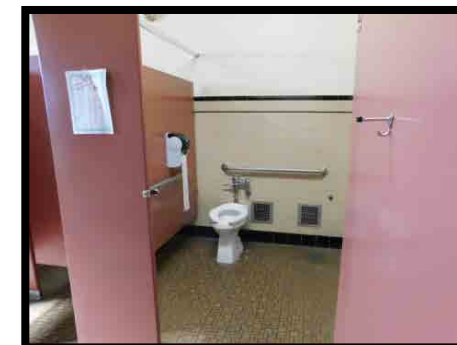


Photo Town Office 18

## **MUNICIPAL CENTER – SENIOR CENTER/VETERAN’S HALL**

**Function and Description of Facility and Programs:** Originally built in 1957 as a school building, the building now serves as the town’s primary administration building for general governmental services including the school department’s administrative offices. A portion of the first level of the building houses the Senior Center and a hallway which houses a memorial for war veterans.



**Responsible Party:** Board of Selectmen

**General Description or Obstacle Which Limits Mobility or Access:** The accessible signage for the rear parking is too high at the top of the signs. None of the accessible spaces in the front or back are designated as van accessible. The front and back ramps have various elements of non-compliance including running slope, abrupt changes in level surface, and deterioration. Interior hallway doors exceed the maximum operating force (5 lbs) and do not meet the minimum closing speed of 6 seconds. Nearly all interior doors lack tactile signage and have non-compliant knob-style hardware. The hallway drinking fountain is not “high-low”. Most glass panels on doors/entries exceed the maximum height under the ADAAG. Some light switches and controls exceed the maximum height for a compliant reach range, inclusive of allowed industry tolerances. Some of the office areas do not have compliant clear widths for maneuverability due to doorway width, placement of desks, cabinets or other items. The designated “accessible” Level 1 and Level 2 bathrooms do not fully adhere to certain height and placement requirements as well as some other areas of non-compliance. The stage in the gymnasium has no vertical access. Stairs on each side of the stage have non-compliant railings as they are provided on one side only and do not extend the slope distance of one tread then 12” parallel to the floor. The stage is closed to the public and is used only for storage. Unless the use of the stage changes, no other action is required at the present time except for the placement of a formal barrier (chain, rope, etc.) with signage restricting access to the stage.

## Municipal Center - Senior Center/Veteran's Hall Accessibility Assessment

<u>General Description of Obstacle</u>	<u>2010 ADAAG</u>	<u>MAAB 521 CMR</u>	<u>Type of Action to be Taken</u>	<u>P</u>	<u>F</u>	<u>TF</u>	<u>Cost Estimate</u>
<b><u>Parking</u></b> Accessible parking for the Senior Center and Veteran's Hall is located at the rear (4 spaces) and the front (2 spaces) of the building. Although vehicle and access aisle widths are adequate, none of the spaces are designated as van accessible. The signage at the back of the building is 2" to 6" too high.	208.2 502.6	23.2 23.6	Signage must be reset at the accessible space closest to the elevator such that the signage height is a minimum of 60" a.f.f. at the bottom (2010 ADAAG Standards) and a maximum of 96" at the top (MAAB 521 CMR. Van accessible signage should be provided for one space at the front and rear of the building.	1	2	I	\$50
The front accessible parking consists of 2 spaces with no access aisle.	502.2 502.3	23.4	Convert and designate one space as an access aisle.	1	2	I	\$50
Cracks and crevices in the rear parking result in an unstable and not level surface with some abrupt changes of more than ¼".	502.4 302	23.4.3	Crack seal parking space and access aisle cracks.	1	3	I	\$250
Most of the spaces are level (2.0% or less) with some spaces (front) and rear access aisle near Veteran's Hall having some sections with a running slope at slightly greater than 2.0%. <b>See Photos Senior Center/Vet 1 and 2</b>	502.4	23.4.3	Overlay and resurface spaces to achieve 2.0% maximum slope the entirety of each space and access aisle.	1	3	L	Up to \$1,800
<b><u>Rear Accessible Route to Veteran's Hall and Senior Center</u></b>  <b><u>Rear Ramp/Stairs to Veteran's Hall</u></b> There is an abrupt change in level surface of roughly 1" at the base of the ramp.	403.4	22.4	The rear steel ramp, railings, and stairs appear to have been fabricated specific to each entrance. Options include rehabilitation of the existing decking including stair railing extensions as needed, elimination of abrupt changes in level surface, and grinding, repairing, and repainting, of the stair and ramp surfaces <u>or</u> replacement of the stairs, ramp, and railings in entirety. Cost will vary depending on materials and design.	1	3	N	Up to \$50,000
The lower segment of the ramp has running slopes that vary up to 9.5% which far exceeds the maximum allowed of 8.3%.	405.2	24.2					
The stair railings are not sloped the distance of one tread and then 12" parallel to the ground at the bottom.	505.10	27.4.3					
The ramp surface is severely deteriorated creating an uneven, unstable, and unlevel surface.	302 405.4	24.7					
<b><u>Rear Ramp/Stairs to Senior Center</u></b> There are abrupt changes in level surface at the ramp base and mid-ramp at steel plate connection points.	403.4	22.4					
The upper segment of the ramp has running slopes that vary in excess of 9.0% which far exceeds the maximum allowed of 8.3%.	405.2	24.2					
The ramp surface is severely deteriorated creating an uneven, unstable, and unlevel surface. <b>See Photos Senior Center/Vet 3, 4, and 5.</b>	302 405.4	24.7					



<b>Front Accessible Route to Senior Center</b>  <u>Ramp to Veteran's Hall</u> Due to checking and curling of the wood decking, the lower segment of the ramp has running slopes that vary up to 8.7% which exceeds the maximum allowed of 8.3%. See Photo Senior Center/Vet 6.	405.2	24.2	Replace decking boards as needed to comply with ramp slope and surface requirements.	1	3	I	Up to \$750
<b>Exterior Picnic Tables and Benches</b> Three picnic tables at the rear of the building and two benches at the front senior center entrance are not on an accessible route.	402 403 221.2 802.1	20 22 14 19	Relocate one picnic table and one bench so they are on an accessible route (existing asphalt surface) with an adjoining wheelchair area next to each. The wheelchair space should be 36" wide x 60" deep per wheelchair. If a front/rear approach, the depth can be reduced to 48" as opposed to 60" for a side approach.	4	1	I	\$0
<b>Exterior Front Entry</b> The exterior doors to the front stair entrance do not comply with the maximum allowed operating force for an exterior door (15 lbs.) and minimum closing speed requirement of 6 seconds under 521 CMR. The door closing speed was 3- 5 seconds and the operating force was up to 25 lbs.  The double doors are each only 31½" wide providing a less than 30" clear width which is 2" too narrow.  The stairs lack railings.  See Photo Senior Center/Vet 7.	404.2.8 404.2.9  404.2  505	26.8 26.9  26  27.4	Adjust door closers such that push/pull force does not exceed 15 lbs for an exterior door, and door closing speed is at least 6 seconds.  The doors are not part of an accessible route so no further action is required.  Provide continuous railings on both sides of the stairs with the top of the handrail between 34" – 38" a.f.f.; round or oval in x-section; and with 12" extensions at the top and the slope distance of one tread then 12" parallel to the ground.	1  -  1	2  -  3	I  -  N	\$100  -  \$1,350
<b>Interior Door Widths</b> Interior double doors at the front entry, hallway, kitchen/cafeteria, and gym are only 31½" wide providing a less than 30" clear width, which is 2" too narrow.	404.2	26	Keep one set of doors at each identified locations in an open fixed position.	2	1	I	\$0
<b>Interior Doors</b> The following interior doors do not fully comply with the maximum allowed operating force for an interior door (5 lbs.) and minimum closing speed requirement of 6 seconds under 521 CMR. <ul style="list-style-type: none"> <li>Hallway double doors to Town Offices.</li> <li>Front entry double doors.</li> </ul>	404.2.8 404.2.9	26.8 26.9	Adjust door closers such that push/pull force does not exceed 5 lbs and door closing speed is at least 6 seconds.	4	2	I	Up to \$350
<b>Doors with Glass Panels</b> Interior doors have glass panes that exceed the maximum viewing height of 43" as follows:  Front entry double doors, hallway double doors to town offices, gym double doors (5), kitchen double doors, (6).	404.2.1	NA	Doors, gates, and side lights adjacent to doors or gates, containing panels that permit viewing through the panels shall have the bottom of at least one panel located 43 inches maximum a.f.f. Modify doors/panels to comply with maximum height restriction.  Seek variance on main entrance interior original doors due to uniqueness of glass pattern. Replace others as required over time based on funds and necessity.	4	3	L	\$0 to TBD

<b><u>Drinking Fountain</u></b> The drinking fountain is non-compliant as it is not a “hi-low” fountain. See <a href="#">Photo Senior Center/Vet 8.</a>	211	36.1.1	Option #1 – Discontinue use of the existing drinking fountain.  Option #2 – remove the existing drinking fountain and replace with a “hi-low” drinking fountain. The drinking fountain must comply as follows:  Protruding objects compliance of no > 4” protrusion between 27” and 80” a.f.f. (307); 30”x48” clear space requirement (305), and knee/toe clearance (306). Knee clearance is 9” to 27” a.f.f; 25” deep max. at 9” a.f.f. or 11” deep min at 9” a.f.f. and 8” deep min at 27” a.f.f. Width of knee clearance s/b 30” wide min (306.3). Toe clearance as part of c.f.s. 17” min – 25” max, 9” high a.f.f., 30” wide (306.2). The spout s/b 15” min from wall and 5” max from the front edge of the unit (602.5). Flow of water 4” high min and spout located max 5” from front (602.6). The spout height s/b 36” max. a.f.f. for “low” and 38” min a.f.f. to 43” max a.f.f. for “high”. The controls s/b operable w/one fist; no > 5 lbs force (309.4).	4	3	N	\$0 to \$2,500
<b><u>Door Signage</u></b> Tactile designation signage is not provided at rooms, offices and storage areas/closets and in some instances, not provided on the latch side of the door. Signage is required at a minimum at the following locations:  Hallway double doors to town offices; hallway storage closet (2); medical equipment loan closet; janitor room; kitchen/cafeteria (10); gym (7); Rooms # 137, 121, 121.2, 122 (2), 123, and 124.	703	41.1	Install accessible compliant designation on the latch side of each door (where allowable) with appropriate finish and contrast and character height and proportions, raised and brailled characters should also be included. Tactile characters on signs s/b 48” min. a.f.f.. from baseline of lowest character and 60” max. a.f.f. to baseline of highest character. Characters must meet the ADA Standards for character height, finish and contrast, accompanied by Grade 2 Braille (703 ADA Standards).	2	2	I	Up to \$1,000
<b><u>Hallway Door Hardware</u></b> Non-compliant knob style hardware exists on most doors. Compliant hardware is required at a minimum at the following locations:  Hallway storage closet (2); janitor room; kitchen/cafeteria (10); gym (7); Rooms # 137, 121, 121.2, 122 (2), 123, and 124.	404.2	26.11	Replace knob-style hardware with compliant door hardware that is easy to operate with one hand and that does not require tight grasping, tight pinching of the wrist to operate.	2	2	N	Up to \$2,000
<b><u>Interior Accessible Route</u></b> The wooden hanging “Grafton Senior Center” sign is a protruding object as it is 79¼” a.f.f. and more than 4” from the nearest wall.  A one-inch door stop in the hallway floor of Veteran’s hall serves as an abrupt change in level surface and a tripping hazard. See <a href="#">Photo Senior Center/Vet 9.</a>	307.2  403 303	20.6.1  22.4	Raise sign a minimum of ¼”.  Remove door stop.	2  2	1  1	I  I	\$0  \$0
<b><u>Counter Heights</u></b> The office service counter of the senior center main office is 6¼” too high.	904.4	7.2	Modify a segment of the counter so that does not exceed 36” a.f.f. in height with a minimum of 36” clear width.	2	3	N	Up to \$500
<b><u>Kitchen Bathroom</u></b> The bathroom is wholly non-compliant including water closet, sink, sink piping,	604 308	30.6 30.8	Discontinue use as a bathroom or modify bathroom to meet 2010 ADA Standards and 521 CMR Standards for a	3	3	L	Up to \$25,000

dispensers and mirror heights, lack of grab bars, and maneuverability.  See Photos Senior Center/Vet 10 and 11.	609 606 603 306 703	30.7 30.9 30.11 30.12 6.5 6.6 41.2	single user accessible toilet room.				
<b>Room 121 Bathroom and Sink</b> The bathroom is wholly non-compliant including door entry (21" clear width) water closet, dispensers and mirror heights, lack of grab bars, and maneuverability. The adjacent sink is non-compliant and lacks adequate clear space.  See Photo Senior Center/Vet 12.	604 308 609 606 603 306 703	30.6 30.8 30.7 30.9 30.11 30.12 6.5 6.6 41.2	Discontinue use as a bathroom/sink. If use is continued, modifications may be required as a reasonable accommodation.	3	1	I	\$0
<b>Men's Bathroom</b> Tactile designation signage is not provided at rooms, offices and storage areas/closets and in some instances, not provided on the latch side of the door.  The water closet stall door lacks an interior pull device.  The grab bars are mounted ¼" too high. Tolerances do not apply to elements with a range for a standard.  The toilet paper dispenser is 12½" o.c. from the front of the water closet.  The stall coat hook is 6" too high.  See Photo Senior Center/Vet 13.	703  604.8.2  609.4  604.7  308.2 308.3	41.1  30.6.1  30.8.2  30.7.6  30.6.1	Install accessible compliant designation on the latch side of each door (where allowable) with appropriate finish and contrast and character height and proportions, raised and brailled characters should also be included. Tactile characters on signs s/b 48" min. a.f.f.. from baseline of lowest character and 60" max. a.f.f. to baseline of highest character. Characters must meet the ADA Standards for character height, finish and contrast, accompanied by Grade 2 Braille (703 ADA Standards).  Install a pull device on the interior stall door at a height of no greater than 48" a.f.f.  Lower the grab bars such that the top of the gripping surface is 33" to 36" a.f.f.  Toilet paper dispenser s/b 7" minimum and 9" maximum in front of the water closet measured to the centerline of the dispenser. The dispenser s/b a minimum of 24" a.f.f. and not mounted above the grab bars under 521 CMR.  Lower coat hook to no more than 48" a.f.f.	3  3  3  3	2  2  2  2	I  I  I  I	\$35  \$25  \$0  \$0  \$0
<b>Women's Bathroom</b> Tactile designation signage is not provided at rooms, offices and storage areas/closets and in some instances, not provided on the latch side of the door.  The water closet stall door lacks an interior pull device and is not self-closing.	703  604.8.2	41.1  30.6.1	Install accessible compliant designation on the latch side of each door (where allowable) with appropriate finish and contrast and character height and proportions, raised and brailled characters should also be included. Tactile characters on signs s/b 48" min. a.f.f.. from baseline of lowest character and 60" max. a.f.f. to baseline of highest character. Characters must meet the ADA Standards for character height, finish and contrast, accompanied by Grade 2 Braille (703 ADA Standards).  Modify or replace hinge so that it is self-closing. Install a pull device on the interior stall door at a height of no greater than 48" a.f.f.	3  3	2  2	I  I	\$35  \$25



The toilet paper dispenser is 12" o.c. from the front of the water closet.	604.7	30.7.6	Toilet paper dispenser s/b 7" minimum and 9" maximum in front of the water closet measured to the centerline of the dispenser. The dispenser s/b a minimum of 24" a.f.f. and not mounted above the grab bars under 521 CMR.	3	2	I	\$0
The stall coat hook is 5" too high.	308.2 308.3	30.6.1	Lower coat hook to no more than 48" a.f.f.	3	2	I	\$0
The water closet flush control is not on the open or wide side.	604.6	30.7.5	Relocate flush control so that it is on the wide or approach side or replace with an automatic flush control. Wrap and/or insulate piping.	3	3	I	Up to \$750
See Photo Senior Center/Vet 14.							

#### Rooms, Offices, Hallway

Room #	Light Switch > 48" ADA 308/521 CMR 6.0	Controls > 48" ADA 308/521 CMR 6.0	Knob-style Hardware ADA 404.2/521 CMR26.11	No Tactile Signage ADA 703/521 CMR 41.1	Inadequate Clear Width ADA 403.5/521 CMR 20.3
Hallway	1	-	-	-	-
Cafeteria	5	4	-	-	-
Veteran's Agent	1	1	-	-	-
SC Main Office		1	-	-	Interior 26" to Director
SC Director's Office	1	-	2	1	Interior 29" to Main
Room #121	-	-	1	1	Interior 27"
Room #121.2	1	1	-	-	-
Priority	4	4	4	4	2
Feasibility	3	3	2	2	2/3
Time Frame	L	L	N	N	L
Total Estimated Cost	Up to \$3,000	Up to \$2,500	Up to \$225	Up to \$70	\$0 to \$1,500

**Actions:** Lower light switches and controls; replace door hardware w/lever-style hardware; install accessible tactile signage; move interior items restricting maneuverability; address internal office door entry widths through reasonable accommodations.

Total of all costs: Up to \$92,365+

#### Municipal Center - Senior Center/Veteran's Hall Accessibility Assessment Photos



Photo Senior Center/Vet 1



Photo Senior Center/Vet 2



Photo Senior Center/Vet 3



Photo Senior Center/Vet 4



Photo Senior Center/Vet 5



Photo Senior Center/Vet 6



Photo Senior Center/Vet 7



Photo Senior Center/Vet 8



Photo Senior Center/Vet 9



Photo Senior Center/Vet 10



Photo Senior Center/Vet 11



Photo Senior Center/Vet 12



Photo Senior Center/Vet 13



Photo Senior Center/Vet 14

## **SOUTH GRAFTON COMMUNITY CENTER**

**Function and Description of Facility and Programs:** Originally built in 1920, this one-story building now provides space for the A.J. Demers American Legion Post 37, Grafton V.F.W. Post 1497, office and meeting space for the Nipmuc Nation, and a community room for use by the general public.



**Responsible Party:** Board of Selectmen

**General Description or Obstacle Which Limits Mobility or Access:** There are two separate accessible parking areas, each consisting of two spaces. The designated accessible spaces to the left of the building and closest to the ramp lack signage and do not have an access aisle. The accessible spaces to the right of the building have non-compliant signage, lack an access aisle, and have a non-compliant level surface including running and cross- slopes. Neither area has a van-accessible designated space. There are abrupt changes in level surface at the base of the ramp to the main entrance, along segments of the ramp, and at the entrance threshold. The ramp railings are not consistently within the required lower and upper railing height range. Stair railings (front and back) are non-compliant. A set of stairs at the back of the building also has non-compliant open risers. The front entrance door and egress door do not meet closing speed requirements. Interior doors lack tactile accessible designation signage and have non-compliant knob hardware. The drinking fountain is not “high-low”. Both the men’s and women’s bathrooms do not fully adhere to certain height and setback requirements as well as other areas of non-compliance.

Both the American Legion/VFW and Community Room kitchen areas have areas of non-compliance including serving counter height (Community Room), sinks (lack of knee clearance and excessive height) as well as non-compliant dispenser heights. Based on the condition of the appliances, counters, cabinets, etc., in the Community Room kitchen, it appears that this facility receives minimal use. If the

Community Room service counter is not used for “self-service” food pick-up then the remaining items of non-compliance should be addressed as required through a request for reasonable accommodation. Similarly, as the American Legion/VFW “kitchen” area is limited to “employees”, then any modifications would only be required as a reasonable accommodation request.

### **Municipal Center - Senior Center/Veteran’s Hall Accessibility Assessment**

<b><u>General Description of Obstacle</u></b>	<b><u>2010 ADAAG</u></b>	<b><u>MAAB 521 CMR</u></b>	<b><u>Type of Action to be Taken</u></b>	<b><u>P</u></b>	<b><u>F</u></b>	<b><u>TF</u></b>	<b><u>Cost Estimate</u></b>
<b><u>Parking</u></b> Four “non-complaint” accessible parking spaces are available to the left (closest) and to the right of the ramp. None of the spaces have designated access aisles. No spaces are designated as van accessible. No signage is provided at the spaces at the left side of the ramp. The signage for the spaces on the right side of the ramp are 24” – 25” too low and do not include the international symbol of accessibility. The running and cross slopes of the spaces to the right of the ramp are in excess of 2.0% (not level) and have unlevel surfaces due to heaving in the asphalt. The spaces to the left of the ramp have a level surface and compliant slopes. Two accessible spaces including one van accessible spaces are required based on the number of parking spaces on site. See <a href="#">Photos Community Center 1 and 2.</a>	208.2 502.2 502.3 502.6 703.7.2	23.2 23.4 23.6	The area to the left of the ramp, which is closest to the ramp entrance, should be designated as the accessible parking. This area will need to be re-striped to create two 8’ wide spaces with a shared 8’ wide access aisle.  Signage must be set such that the signage height should be a minimum of 60” high at the bottom (2010 ADAAG Standards) and a maximum of 96” at the top (MAAB 521 CMR) and located in front of each space. One space must have signage noting it as van accessible. Both signs must contain the international symbol of accessibility.	1	2	I	\$200
<b><u>Ramp to Main Entrance</u></b> There is an abrupt change in level surface of roughly 1” at the base of the ramp from the transition from asphalt to concrete. The ramp also has areas of surface deterioration resulting in changes of level surface of greater than ¼” as well as a 1½” gap at the exterior threshold. See <a href="#">Photos Community Center 3, 4, and 5.</a>  The ramp railings are not consistently within the height ranges for bottom and top railings being 1”–2 ½” too low. Railings are also rusted and deteriorated with peeling paint. <u>Note:</u> Tolerances do not apply to ranges.  A mailbox is mounted directly over the railings at the top of the ramp restricting use. See <a href="#">Photo Community Center 6.</a>	403.4 405  505.4  505	22.4 24  24.5  24	Cut-out and replace the minimum required section of asphalt required and repave to eliminate the change in level surface. Patch the ramp to eliminate surface changes.  Modify/adjust railings to comply with 18”-20” a.f.f. (bottom) and 34”-38” a.f.f. (top) height ranges to the top of the handrail. Scrape, sand, and repaint handrails.  Relocate mailbox.	1  1	3  2	N  I	\$200  Up to \$1,000  \$0
<b><u>Front Entrance and Front Egress Stairs</u></b> The railings for the stairs at the front entrance near the ramp and the front side egress are non-compliant as they lack bottom extensions. The side egress stairs have railings on only one side. See <a href="#">Photos Community Center 7 and 8.</a>	505.2 505.3 505.10	27.4	Modify existing railings to have a sloped extension the distance of one tread then 12” parallel to the ground. Provide an additional railing (34”-38” a.f.f. to the top of the railing with top and bottom extensions) mounted on the building at the front egress stairs.	1	3	N	Up to \$2,000



<b>Stairs at Rear of Building</b> The railings on the stairs (2 sets of stairs) at the rear of the building are non-complaint. The deck stairs have non-compliant open risers, have a railing on only one side, and the existing railing is not oval or circular in shape. The other stairs have non-compliant railings on one side due to being not oval or circular in shape with the railings on the building not having bottom extensions. See Photos Community Center 9 and 10.	504.3 505.2 505.10 505.7	27.2 27.4.1 27.4.3 27.4.4	Provide 12" extensions parallel to the ground the slope distance of one tread then 12" at the bottom of the stairs. Provide complaint railings that are round or oval in x-section and 1 1/4" – 2" in outside diameter. Install riser boards to close in risers.	1	3	N	Up to \$1,000
<b>Exterior Entrance and Egress Doors</b> The exterior doors do not comply with the minimum closing speed requirement of 6 seconds under 521 CMR. The door closing speeds were 3-4 seconds.	404.2.8	26.9	Adjust door closers such that push/pull force does not exceed 15 lbs for an exterior door, and door closing speed is at least 6 seconds.	1	2	I	\$50
<b>Interior Door Signage</b> Tactile designation signage is not provided at rooms, offices and storage areas/closets. A total of fourteen (14) signs are required. See Photo Community Center 11.	703	41.1	Install accessible compliant designation on the latch side of each door (where allowable) with appropriate finish and contrast and character height and proportions, raised and brailled characters should also be included. Tactile characters on signs s/b 48" min. a.f.f. from baseline of lowest character and 60" max. a.f.f. to baseline of highest character. Characters must meet the ADA Standards for character height, finish and contrast, accompanied by Grade 2 Braille (703 ADA Standards).	2	2	I	Up to \$490+
<b>Interior Door Hardware</b> Non-compliant knob style hardware exists on most doors. Compliant hardware is required on seven (7) doors.	404.2	26.11	Replace knob-style hardware with compliant door hardware that is easy to operate with one hand and that does not require tight grasping, tight pinching of the wrist to operate.	2	2	N	Up to \$525+
<b>Coat Rack</b> A coat rack in the hallway exceeds the maximum reach range by 21	308.2 308.3	6.5 6.6	Provide a minimum of 5% of coat hooks or equivalent space on a coat rack at a height of no more than 48" a.f.f.	4	2	I	Up to \$50
<b>Drinking Fountain</b> The drinking fountain is non-compliant as it is not a "hi-low" fountain. See Photo Community Center 12.	211	36.1.1	Option #1 – Discontinue use of the existing drinking fountain.  Option #2 – remove the existing drinking fountain and replace with a "hi-low" drinking fountain. The drinking fountain must comply as follows:  Protruding objects compliance of no > 4" protrusion between 27" and 80" a.f.f. (307); 30"x48" clear space requirement (305), and knee/toe clearance (306). Knee clearance is 9" to 27" a.f.f; 25" deep max. at 9" a.f.f. or 11" deep min at 9" a.f.f. and 8" deep min at 27" a.f.f. Width of knee clearance s/b 30" wide min (306.3). Toe clearance as part of c.f.s. 17" min – 25" max, 9" high a.f.f., 30" wide (306.2). The spout s/b 15" min from wall and 5" max from the front edge of the unit (602.5). Flow of water 4" high min and spout located max 5" from front (602.6). The spout height s/b 36" max. a.f.f. for "low" and 38" min a.f.f. to 43" max a.f.f. for "high". The controls s/b operable w/one fist; no > 5 lbs force (309.4).	4	3	N	\$0 to \$2,500
<b>Women's Bathroom</b> The wall mounted mirror (42 1/2" a.f.f.) is 2 1/2" too high.  The towel dispenser (57" a.f.f.) is outside the zone of reach under 521 CMR.	603.3  308.2 308.3	30.11  30.12 6.5 6.6	Lower mirror such that the bottom of the mirror (reflecting surface) is no greater than 40" a.f.f.  Lower dispenser to a max. of 42" a.f.f. (521 CMR).	3  3	2  2	I  I	\$25  \$0

The sink piping is not wrapped, insulated or guarded.	606.5	30.9.5	Wrap or insulate piping.	3	2	I	\$25
The toilet paper dispenser is 22" .a.f.f. and 3" o.c. from the front of the water closet.	604.7 309.4	30.7.6	Relocate toilet paper dispenser. Toilet paper dispenser s/b 7" minimum and 9" maximum in front of the water closet measured to the centerline of the dispenser. The dispenser s/b a minimum of 24" a.f.f. and not mounted above the grab bars under 521 CMR.	3	2	I	\$0
The water closet is 40½" from the far wall which is 1½" too close.  See Photo Community Center 13.	604.2	30.7.2	The far wall setback is a minimum of 42". Accounting for a 1" tolerance, the water closet is still ½" too close. As it will require the removal of a wall to achieve the additional ½", seek a variance if required and take no other action.	3	-	-	\$0
<b>Men's Bathroom</b>							
The wall mounted mirror (45½" a.f.f.) is 5½" too high.	603.3	30.11	Lower mirror such that the bottom of the mirror (reflecting surface) is no greater than 40" a.f.f.	3	2	I	\$25
The towel dispenser (59" a.f.f.) is outside the zone of reach under 521 CMR and protrudes 10" into the accessible route of travel.	308.2 308.3 307.2	30.12 6.5 6.6 20.6.1	Lower dispenser to a max. of 42" a.f.f. (521 CMR) and relocate out of the accessible route of travel.	3	2	I	\$0
The sink piping is not wrapped, insulated or guarded.	606.5	30.9.5	Wrap or insulate piping.	3	2	I	\$25
The toilet paper dispenser is 22" .a.f.f. and 3" o.c. from the front of the water closet.	604.7 309.4	30.7.6	Relocate toilet paper dispenser. Toilet paper dispenser s/b 7" minimum and 9" maximum in front of the water closet measured to the centerline of the dispenser. The dispenser s/b a minimum of 24" a.f.f. and not mounted above the grab bars under 521 CMR.	3	2	I	\$0
The water closet flush control is not on the open or wide side.	604.6	30.7.5	Relocate flush control so that it is on the wide or approach side or replace with an automatic flush control	3	3	N	Up to \$750
The water closet stall door lacks an interior pull device and is not self-closing.	604.8.1 404.2.7	30.6.1	Modify or replace hinge so that it is self-closing. Install a pull device on the interior stall door at a height of no greater than 48" a.f.f.	3	2	I	\$100
The coat hook on the stall door is 64" a.f.f. which exceeds the maximum reach range under ADAAG by 16". See Photo Community Center 14.	308 603.4	30.6.1	Lower coat hook to no more than 48" a.f.f.	3	2	I	\$0

Total up to \$8,965+

### **South Grafton Community Center Accessibility Assessment Photos**



Photo Community Center 1



Photo Community Center 2



Photo Community Center 3



Photo Community Center 4



Photo Community Center 5



Photo Community Center 6

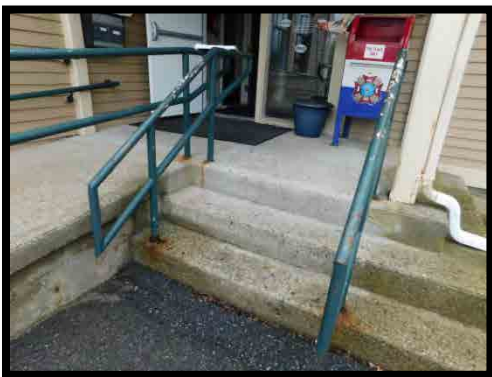


Photo Community Center 7



Photo Community Center 8





Photo Community Center 9



Photo Community Center 10



Photo Community Center 11



Photo Community Center 12



Photo Community Center 13



Photo Community Center 14

## **NELSON MEMORIAL LIBRARY**

**Function and Description of Facility and Programs:** Nelson Memorial Library is a branch, neighborhood library serving North Grafton. This 1½ story building was built in 1975 and provides a variety of library services including community space, a children’s section, and an adult room on the upper level.



**Responsible Party:** Library Trustees

**General Description or Obstacle Which Limits Mobility or Access:** The “accessible” parking spaces do not meet signage and slope requirements and lacks a van accessible accessible space. The brick walkway to the entrance has numerous abrupt changes in level surface due to deferred maintenance. The interior doors exceed the maximum operating force (5 lbs.) and both interior and exterior doors do not meet the minimum closing speed of 6 seconds. Interior doors have non-complaint hardware and lack tactile accessible signage. Light switches and controls exceed the maximum reach range. The drinking fountain is not high-low. An office sink and counter is non-compliant. Both the men’s and women’s bathrooms have numerous items of non-compliance. The women’s bathroom has limited maneuverability. There is no vertical access to the second level. The stair railings to the second level are non-compliant due to shape, size, and lack of extensions. The placement of some tables, chairs, and display holders reduces the minimum required clear width to less than the required 36”. The hardware to the card catalogue is non-compliant.

## Nelson Memorial Library Accessibility Assessment

<b>Parking</b> None of the spaces are designated as van accessible and the current striping does not meet van space and access aisle requirements.  The signage is 30½" too low and is not designated as van accessible.  The existing spaces and access aisle are not level (2.0% or less) as the running and cross slopes vary from 2.6% to 3.6%. <a href="#">See Photo Nelson Library 1.</a>	208 502	23	Re-stripe the parking to create an 8' wide van accessible space with an 8' wide access aisle.	1	2	N	\$100
	502.6	23.6	Signage must be reset to be in front of the accessible space such that the signage height is a minimum of 60" a.f.f. at the bottom and a maximum of 96" at the top. A "van accessible" sign must be provided. Signage cannot be more than 10' from the front of the space.	1	2	N	\$25
	502.4	23.4.3	Reconstruct and/or resurface the existing accessible parking area (whichever is feasible) to create level surfaces of no greater than 2.0% in all directions.	1	3	N	Up to \$5,000
<b>Accessible Route to the Front Entry</b> The brick paver accessible route from the parking space to the front entrance has numerous abrupt changes in level surface of > ¼" due to deteriorated, chipped, or raised brick and gaps between brick. <a href="#">See Photo Nelson Library 2.</a>	403	22.4	Remove/replace, reconstruct and/or reset the brick walkway such that there are no abrupt changes in level surface of > ¼" or remove the brick and replace with concrete.	1	3	N	Up to \$2,500
<b>Exterior and Interior Doors</b> Doors do not fully comply with the maximum allowed operating force (15 lbs. exterior, 5 lbs. interior) and minimum closing speed requirement of 6 seconds.	404.2.8 404.2.9	26.8 26.9	Adjust door closers such that push/pull force does not exceed 15 lbs for an exterior door and 5 lbs for an interior door. Door closing speed must be at least 6 seconds.	2	2	I	\$50
<b>Interior Door Signage</b> Tactile designation signage to identify rooms, offices, bathrooms, stairs, and storage areas/closets is not provided. A total of 9 locations were identified.	703	41.1	Install accessible compliant designation on the latch side of each door (where allowable) with appropriate finish and contrast and character height and proportions, raised and brailled characters should also be included. Tactile characters on signs s/b 48" min. a.f.f.. from baseline of lowest character and 60" max. a.f.f. to baseline of highest character. Characters must meet the ADA Standards for character height, finish and contrast, accompanied by Grade 2 Braille (703 ADA Standards). Bathroom signage should include the universal symbol of accessibility.	2	2	I	\$315
<b>Door Hardware</b> Non-compliant knob-style door hardware is located in the community room (3) and office (2).	404.2	26.11	Door hardware must be operable with a closed fist or loose grip and shall not require tight grasping or tight pinching of the wrist to operate. Replace knob-style hardware with lever hardware.	1	2	N	\$375
<b>Controls, Switches, and Outlets</b> Six (6) controls and switches exceed the maximum reach range under the 2010 ADA Standards as follows: <ul style="list-style-type: none"> <li>Controls (Community Room, Main Area)</li> <li>Switches (Community Room, Main Area, Men's BR, Women's BR)</li> </ul>	308.2 308.3	6.5 6.6	Lower controls, light switches, and outlets to no more than 48" a.f.f.	4	3	L	Up to \$1,500+

<b>Office Sink/Counter</b> The counter and sink in the office does not provide knee clearance. See Photo Nelson Library 3.	804.3.2 306.2	32.2 32.5 32.6 32.7	As this space is not open to the public, take no further action unless required as a reasonable accommodation. If then so required, modify the counter and sink so that there is a minimum of 27" knee clearance at the sink with guarded, wrapped, or insulated piping.	4	3	L	\$0 to \$500
<b>Drinking Fountain.</b> The drinking fountain is non-compliant as it is not a "hi-low" fountain.  See Photo Nelson Library 4.	211	36.1.1	Option #1 – Discontinue use of the existing drinking fountain.  Option #2 – remove the existing drinking fountain and replace with a "hi-low" drinking fountain. The drinking fountain must comply as follows:  Protruding objects compliance of no > 4" protrusion between 27" and 80" a.f.f. (307); 30"x48" clear space requirement (305), and knee/toe clearance (306). Knee clearance is 9" to 27" a.f.f.; 25" deep max. at 9" a.f.f. or 11" deep min at 9" a.f.f. and 8" deep min at 27" a.f.f. Width of knee clearance s/b 30" wide min (306.3). Toe clearance as part of c.f.s. 17" min – 25" max, 9" high a.f.f., 30" wide (306.2). The spout s/b 15" min from wall and 5" max from the front edge of the unit (602.5). Flow of water 4" high min and spout located max 5" from front (602.6). The spout height s/b 36" max. a.f.f. for "low" and 38" min a.f.f. to 43" max a.f.f. for "high". The controls s/b operable w/one fist; no > 5 lbs force (309.4).	4	3	N	\$0 to \$2,500
<b>Card Catalogue</b> The hardware on the card catalogue is non-compliant as it requires pinching and twisting of the wrist and the drawers cannot be opened with a closed fist.	309.4	39.5	Modify hardware as feasible to comply with operable parts standards.	2	2	N	TBD
<b>Rugs/Mats</b> A rug by the bathrooms is unsecured, has frayed edges and serves as a tripping hazard. See Photo Nelson Library 5.	302	29.3	Secure mat and edges or remove when not in use.	4	1	I	\$0
<b>Stair Railings to Upper Level</b> The railings for the stairs are non-compliant due to the size and shape of the railings and the lack of top and bottom extensions.  See Photo Nelson Library 6.	505.10 505.7	27.4	Replace existing railings with railings that are between 34" to 38" in height (505.4, 27.4.2); have a 12" extension parallel to the ground at the top and an extension sloped the distance of one tread then 12" parallel to the ground (505.10, 27.4.3); and are round or oval in x-section (505.7, 27.4.5).	1	3	N	\$15,000
<b>Vertical Access</b> There is no accessible route of travel to the upper level adult room.	401	20	Option #1: Restrict and close access to the second level.  Option #2: Provide a lift to the second level of the library.	2	4	L	\$0 to \$45k+
<b>Tables and Seating</b> The work/meeting table on the second level does not provide the required minimum 27" knee clearance.	226.1 306.3 902.3	35.1 35.5 35.6	At least 5% or not less than 1 table shall be accessible. Tables must provide at least 27" a.f.f. of knee clearance 30" wide and 19" deep (521 CMR). The tops of tables should be 28" to 34" a.f.f. If the second level is made accessible, the table should be blocked and raised a minimum of 1" to meet the required knee clearance height or an accompanying smaller table provided.	2	2	L	\$0 to \$100

<b><u>Maneuverability</u></b> The clear width is reduced to less than the required 36" around and between some items (tables, desks, display cases, etc.)	403.5	20.3	To the extent possible move items as required to achieve minimum 36" clear width. Under the ADAAG, a clear width of 32" is allowed for a distance of no more than 24"	2	1	I	\$0
<b><u>Men's Bathroom</u></b> The urinal is 6" too high.	605.2	30.10	Lower urinal to no more than 17" a.f.f.	3	3	N	Up to \$500
The sink is not wrapped, guarded, or insulated.	606.5	30.9.5	Wrap or insulate piping.	3	2	N	\$50
The wall mounted mirror is 1½" too high.	603.3	30.11	Lower mirror such that the bottom of the mirror (reflecting surface) is no greater than 40" a.f.f.	3	2	N	\$0
The wall mounted mirror (41½" a.f.f.) is 1½" too high.	603.3	30.11	Lower mirror such that the bottom of the mirror (reflecting surface) is no greater than 40" a.f.f.	3	2	I	\$25
The soap dispenser (45½" a.f.f.) is outside the zone of reach under 521 CMR.	308.2 308.3	30.12 6.5 6.6	Lower dispenser to a max. of 42" a.f.f. (521 CMR).	3	2	I	\$0
The water closet grab bars are mounted ¾" too high. <u>Note:</u> No tolerance allowed for heights with a range. Bars are rusted.	609.4	30.8.2	Lower grab bars such that the top of the gripping surfaces are 33" to 36" a.f.f. Bars need to be sanded or cleaned to remove rust.	3	2	I	\$25
The water closet toilet paper dispenser is 14½" o.c. from the front of the water closet and is 31" a.f.f.	604.7	30.7.6	Toilet paper dispenser s/b 7" minimum and 9" maximum in front of the water closet measured to the centerline of the dispenser. The dispenser s/b a minimum of 24" a.f.f. and not mounted above the grab bars.	3	2	I	\$25
The flush control of the water closet is not on the approach side (604.6, 30.7.5). The water closet is 1" too close to the near wall; 17" too close to the nearest object on the approach side (604.2, 30.7.2); and is ½" too high at the top of the seat (604.4, 30.7.3). <u>Note:</u> No tolerance allowed for heights with a range. <b>See Photo Nelson Library 7.</b>	604.6 604.2 604.4	30.7.5 30.7.2 30.7.3	The bathroom will need to be modified with possible relocation of the sink and relocation/removal of the urinal to achieve minimum water closet near and far wall setbacks. The existing water closet should be replaced with one that is between 17" – 19" a.f.f. to the top of the seat and with a flush control on the approach side. The centerline of the water closet should be 18" from the nearest sidewall and at least 42" from the farthest sidewall or object.	3	3	N	Up to \$7,500
<b><u>Women's Bathroom</u></b> The sink is not wrapped, guarded, or insulated.	606.5	30.9.5	Wrap or insulate piping.	3	2	N	\$50
The wall mounted mirror is 2¼" too high.	603.3	30.11	Lower mirror such that the bottom of the mirror (reflecting surface) is no greater than 40" a.f.f.	3	2	N	\$0
The wall mounted mirror (41½" a.f.f.) is 1½" too high.	603.3	30.11	Lower mirror such that the bottom of the mirror (reflecting surface) is no greater than 40" a.f.f.	3	2	I	\$25
The soap dispenser (45" a.f.f.) is outside the zone of reach under 521 CMR.	308.2 308.3	30.12 6.5 6.6	Lower dispenser to a max. of 42" a.f.f. (521 CMR).	3	2	I	\$0
The water closet grab bars are mounted ¾" too high. <u>Note:</u> No tolerance allowed for heights with a range.	609.4	30.8.2	Lower grab bars such that the top of the gripping surfaces are 33" to 36" a.f.f.	3	2	I	\$25
The water closet toilet paper dispenser is 12" o.c. from the front of the water closet and is 32" a.f.f.	604.7	30.7.6	Toilet paper dispenser s/b 7" minimum and 9" maximum in front of the water closet measured to the centerline of the dispenser. The dispenser s/b a minimum of 24" a.f.f. and not mounted above the grab bars.	3	2	I	\$25



The water closet is 1" too close to the near wall; 20" too close to the nearest object on the approach side (604.2, 30.7.2); and is ½" too high at the top of the seat (604.4, 30.7.3). <u>Note:</u> No tolerance allowed for heights with a range. <b>See Photo Nelson Library 8.</b>	604.2 604.4	30.7.2 30.7.3	The bathroom is only 5'5" x 5'8" and cannot meet required setbacks and maneuverability without substantial modification. Due to the limited room width, the grab bars extend over the sink. As with the men's bathroom, the women's bathroom will need to be modified or expanded including relocation/replacement of the sink to achieve minimum water closet near and far wall setbacks. The existing water closet should be replaced with one that is between 17" – 19" a.f.f. to the top of the seat and with a flush control on the approach side. The centerline of the water closet should be 18" from the nearest sidewall and at least 42" from the farthest sidewall or object.	3	3	N	TBD - up to \$25k+
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Total up to \$106,215+

### **Nelson Memorial Library Accessibility Assessment Photos**



Photo Nelson Library 1



Photo Nelson Library 2

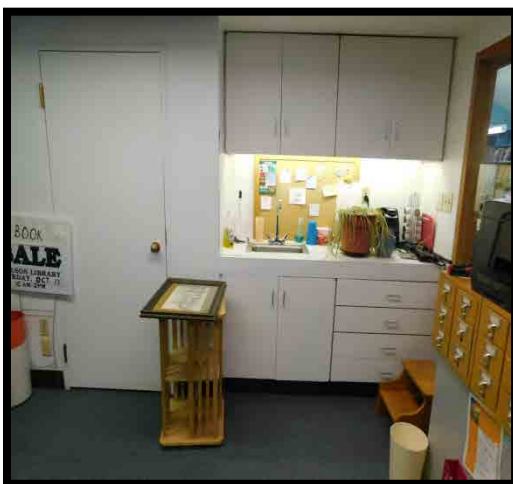


Photo Nelson Library 3



Photo Nelson Library 4

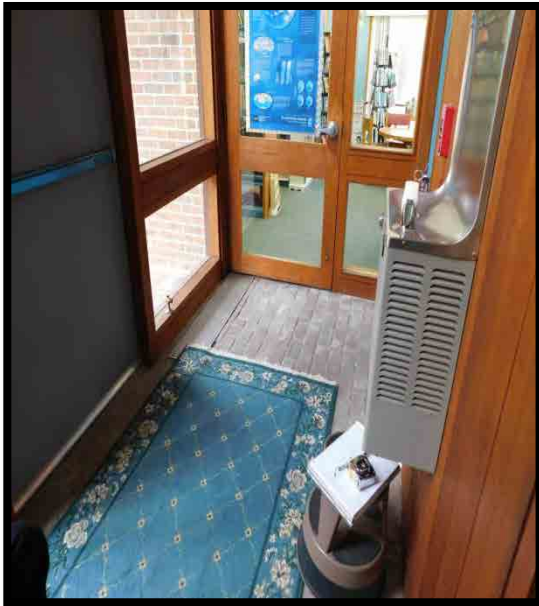


Photo Nelson Library 5

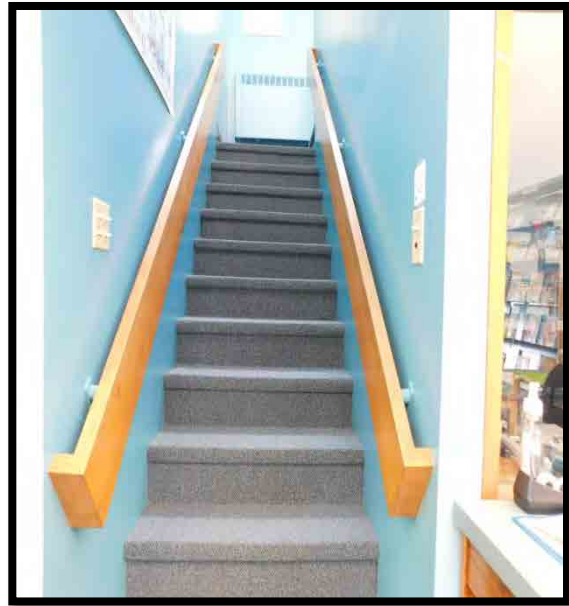


Photo Nelson Library 6



Photo Nelson Library 7

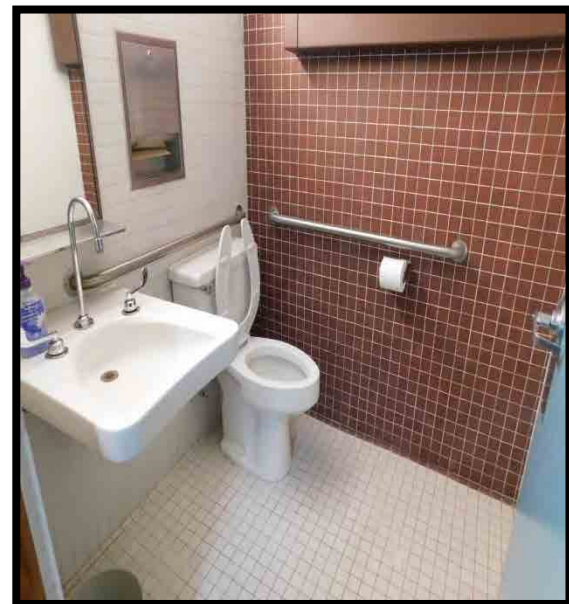


Photo Nelson Library 8

## **POLICE STATION**

**Function and Description of Facility and Programs:** The Grafton Police Station is a 3 level (1<sup>st</sup> story, 2<sup>nd</sup> story, basement) masonry structure which was built in 2006. The Police Department is a full-service department with the responsibility to provide public safety services to the nearly 18,000 residents of the Town of Grafton. The Department has 26 personnel including the Chief of Police, 1 Lieutenant, 1 Detective, 4 Sergeants, 13 Police Officers, 5 Dispatchers, and 1 Administrative Assistant. The Department has various divisions and units, to include Patrol, Investigations, Family Services, School Resource Officers and Licensing.



**Responsible Party:** Board of Selectmen.

**General Description or Obstacle Which Limits Mobility or Access:** The Police Station is substantially compliant but does have some areas of non-compliance. The signage for the designated accessible parking is 2" to 4" too high. The accessible route(s) from the parking spaces to the front entrance exceed the maximum allowed running slope for a walkway (5.0%) on one side and lacks railings whereas the opposite approach exceeds the maximum running slope for a ramp (8.3%) and similarly lacks railings. The immediate approach at the entry door has a running slope that varies up to 9.6%. Doors exceed maximum operating force and minimum closing speeds. Some interior doors lack tactile signage or the signage is not mounted on the latch side. Various controls, switches, and telephones exceed the maximum reach range. The drinking fountain (basement level) is not "high-low". The kitchenettes (2 on 1<sup>st</sup> level, 1 on 2<sup>nd</sup> level) have counters/sinks that are too high and lack knee clearance. The Level 1 Break Room stove has non-compliant controls. The "public" Level 1 Lobby and Level 2 bathrooms have non-compliant toilet paper dispensers due to location. The Dispatch and Level 1 Men and Women's Staff bathrooms have a number of areas of non-compliance. The Level 1 Men and Women's Staff bathrooms

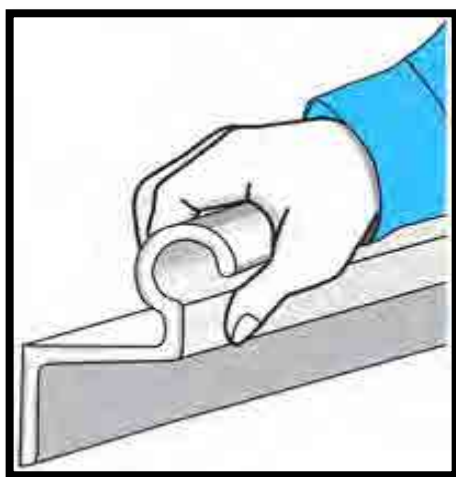


both have tactile designation signage with the universal symbol of accessibility but neither bathroom has grab bars for the respective water closet. The basement level, which is not open to the public, contains the fitness room and men's and women's locker rooms for sworn police personnel. All police officers must meet strict physical requirements which a person with a mobility limiting disability would not be able to perform. Therefore, unless there are changes in policies, procedures, and operations, modifications to the basement locker rooms are not required at the present time. The basement fitness room, which appears to be open to all station personnel (dispatch, administrative, police) does not have the required clear width between exercise equipment. The apparent "accessible holding cell" does meet minimum requirements for maneuverability, sink height, sink knee clearance, and water closet height and setbacks. The cell does not provide grab bars for the water closet.

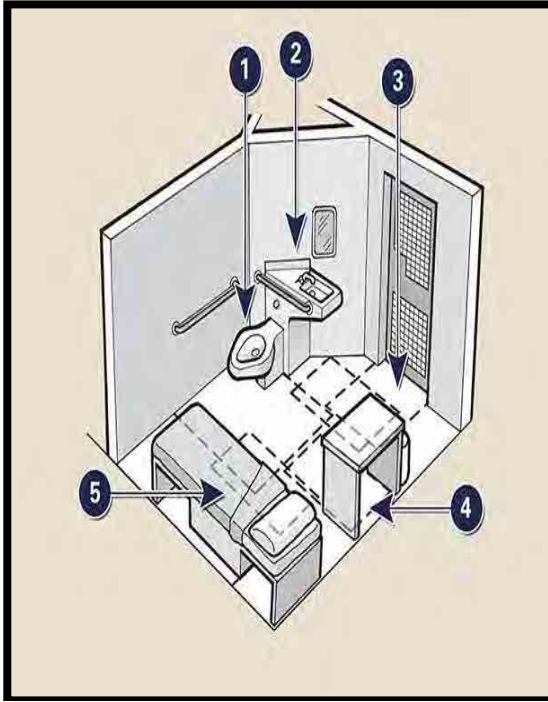
**Under Section 232.2 of the 2010 ADAAG** alterations to cells shall not be required to comply except to the extent determined by the Attorney General (federal). **Advisory 232.2:** General Holding Cells and General Housing Cells Exception. Although these requirements do not specify that cells be accessible as a consequence of an alteration, Title II of the ADA requires that each service, program, or activity conducted by a public entity, when viewed in its entirety, be readily accessible to and usable by individuals with disabilities. This requirement must be met unless doing so would fundamentally alter the nature of a service, program, or activity or would result in undue financial and administrative burdens.

Inmates in local correctional facilities may have mobility disabilities and need to be housed in accessible cells. Federal laws protect people with disabilities from discrimination by State and local governments, including entities that own or operate correctional facilities. All such entities are covered by the Americans with Disabilities Act of 1990 (ADA), and those that receive Federal funds are also covered by section 504 of the Rehabilitation Act. These laws prohibit discrimination against persons with disabilities, including inmates who use wheelchairs, scooters, walkers, or other mobility devices. While all aspects of law enforcement and correctional services are covered by these laws - including facilities, employment, transportation, and other activities, programs, and services.

Grab bars can be designed so they do not increase suicide risk. As shown, there are several ways for grab bars to be designed with adequate gripping surfaces, while ensuring that nothing can be tied onto them (see below).



For illustrative purposes, a typical room layout and general features of an accessible cell is shown below.



Rendering of ADA Compliant Cell



Photo of ADA Compliant Cell

### Police Station Accessibility Assessment

General Description of Obstacle	2010 ADAAG	MAAB 521 CMR	Type of Action to be Taken	P	F	TF	Cost Estimate
<b>Parking</b> The existing 3 signs are 98" to 100" a.f.f. at the top which is 2" too high.  See Photo Police 1.	502	23.6	Signage must be reset such that signage height should be a minimum of 60" high at the bottom (2010 ADAAG Standards) and a maximum of 96" at the top (MAAB 521 CMR) and located in front of each space.	1	2	I	\$0+
<b>Accessible Route to Main Entrance</b> The accessible route from the parking spaces to the front entrance has a running slope of up to 9.2% on the left side (facing the building) and up to 8.1% on the right side. At the immediate entry, the running slope approaches 9.6%.  See Photos Police 2 and 3.	403.3	22.3	To eliminate the necessity and related cost of railings (up to \$5,000), reconstruct the affected concrete pads and other segments as may be required such that the running slopes are no greater than 5.0%. If not feasible, reconstruct only those segments with a running slope of more than 8.3% and provide compliant paired railings for those segments with running slopes of 5% up to 8.3%. Railings must be between 34" -38" a.f.f. and 18" – 20" a.f.f to the top of the railing with 12" extensions at the top and bottom.	1	3	I	Up to \$5,000
<b>Exterior Front Entry</b> The exterior main entrance door does not comply with the minimum closing speed requirement of 6 seconds under 521 CMR.	404.2.8	26.9	Adjust door closer such that the door closing speed is at least 6 seconds.	1	2	I	\$0

<b>Interior Doors</b> The following interior doors do not fully comply with the maximum allowed operating force for an interior door (5 lbs.) and minimum closing speed requirement of 6 seconds under 521 CMR. <ul style="list-style-type: none"> <li>Bathrooms (Lobby, Level 1 Women's, Level 1 Men's, Dispatch, Level 2 Women's, Level 2 Men's).</li> <li>Level 1 door to Administration.</li> <li>Rooms #119, 145.</li> <li>Cell block door.</li> <li>Door to garage.</li> <li>Door to sally port.</li> </ul>	404.2.8	26.8	Adjust door closers such that push/pull force does not exceed 5 lbs and door closing speed is at least 6 seconds.	2	2	I	Up to \$200
	404.2.9	26.9		3			
				4			

<b>Signage</b> The following doors lack tactile accessible signage: doors by garage (2), doors in break room (2), cell block (7), dispatch bathroom, Level 2 training Room (2), Level 2 mechanical room, basement (2).  The following doors do not have the signage mounted on the latch side: Room #129, #114.	703	41.1	Install accessible compliant signage) on the latch side of each door (where allowable) with appropriate finish and contrast and character height and proportions, raised and brailled characters should also be included. Tactile characters on signs s/b 48" min. a.f.f. from baseline of lowest character and 60" max. a.f.f. to baseline of highest character. Characters must meet the ADA Standards for character height, finish and contrast, accompanied by Grade 2 Braille (703 ADA Standards).	2 3	2	I	\$560
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<b>Hallway Controls, Switches, Phones and Outlets</b> The following are not within the required reach range: Room #144 controls; Room #136 control; Break Room phone and control; Room #118 control; Cell area phone; Level 2 Training Room phone, light switch, projector switch, control; Basement Exercise Room phone, control.	308.2 308.3	6.5 6.6	Lower light switches, controls, phones, and outlets to no more than 48" a.f.f.	4	3	L	Up to \$4,500
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<b>Level 1 Break Room Kitchen Area</b> The dispatch kitchen area has a sink/counter that is too high (36" a.f.f.) and lacks knee clearance beneath the sink; a stove with controls that are non-compliant and are not located on the front of the stove; and a microwave oven that is beyond the maximum reach range. <b>See Photo Police 4.</b>	304 306 307 804.6 309 308.2 308.3	6.5 6.6 32.7 32.8 39.5	Replace section of counter with sink and replace with a counter no higher than 34" and a sink with compliant knee and toe clearance (306, 304; 32.7). A microwave must be provided within height and reach range requirements for either a counter or wall mounted microwave (308.2, 308.3; 6.5, 6.6). Replace the stove with one with the controls on the front of the stove and which do not require twisting (307, 804.6, 309; 32.8, 39.5).	2	3	L	Up to \$1,500+
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<b>Level 1 Hallway Kitchenette and Level 2 Training Room Kitchenette</b> The Level 1 Hallway kitchenette area and Level 2 Training Room kitchenette both have a sink/counter that is too high (36"-36½" a.f.f.), lack knee clearance beneath the sink, and have bubblers that are 2½" too high and 2" too far from the outside edge; and microwave ovens that are beyond the maximum reach range. <b>See Photo Police 5.</b>	304 306 308.2 308.3 602.4 602.5	6.5 6.6 32.7 36.3 36.4	At each location - replace section of counter with sink and replace with a counter no higher than 34" and a sink with compliant knee and toe clearance (306, 304; 32.7). A microwave must be provided within height and reach range requirements for either a counter or wall mounted microwave (308.2, 308.3; 6.5, 6.6). The bubbler can be no more than 36" a.f.f. and no more than 5" from the front edge (602.4, 602.5; 36.3, 36.4).	2	3	L	Up to \$2,500+
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<b><u>Drinking Fountain (Basement Level)</u></b> The drinking fountain is non-compliant as it is not a "hi-low" fountain.  See Photo Police 6.	211	36.1.1	Option #1 – Discontinue use of the existing drinking fountain.  Option #2 – remove the existing drinking fountain and replace with a "hi-low" drinking fountain. The drinking fountain must comply as follows:  Protruding objects compliance of no > 4" protrusion between 27" and 80" a.f.f. (307); 30"x48" clear space requirement (305), and knee/toe clearance (306). Knee clearance is 9" to 27" a.f.f; 25" deep max. at 9" a.f.f. or 11" deep min at 9" a.f.f. and 8" deep min at 27" a.f.f. Width of knee clearance s/b 30" wide min (306.3). Toe clearance as part of c.f.s. 17" min – 25" max, 9" high a.f.f., 30" wide (306.2). The spout s/b 15" min from wall and 5" max from the front edge of the unit (602.5). Flow of water 4" high min and spout located max 5" from front (602.6). The spout height s/b 36" max. a.f.f. for "low" and 38" min a.f.f. to 43" max a.f.f. for "high". The controls s/b operable w/one fist; no > 5 lbs force (309.4).	4	3	N	\$0 to \$2,500
<b><u>Basement Fitness Room</u></b> There is inadequate clear width for maneuverability between exercise equipment.	403.5	20.3	As feasible, rearrange equipment to provide a minimum 36" clear width between equipment.	2	1	I	\$0
<b><u>Lobby, Dispatch, Level 2 Men's and Level 2 Women's Bathrooms</u></b> The toilet paper dispensers are 3" – 4" o.c. from the front of the water closet.  See Photo Police 7.	604.7	30.7.6	Toilet paper dispensers s/b 7" minimum and 9" maximum in front of the water closet measured to the centerline of the dispenser. The dispensers s/b a minimum of 24" a.f.f. and not mounted above the grab bars.	3	2	I	\$50
<b><u>Dispatch, Level 1 Women's, and Level 1 Men's Bathrooms</u></b> The sink piping is not fully wrapped, insulated, or guarded.  See Photo Police 8.	606.5	30.9.5	Wrap and/or insulate piping.	3	2	I	\$75
<b><u>Level 1 Women's and Level 1 Men's Bathrooms</u></b> The men's and women's water closets are 31" – 32" too close to the sink on the far side.  The men's and women's water closets lack grab bars.  The men's water closet is ½" too high.  See Photos Police 9 and 10.	604.2  609  604.4	30.7.2  30.8  30.7.3	Although the bathrooms are designated as "accessible", they are not. The bathrooms have limited maneuverability and lack grab bars.  Do not designate the bathrooms as accessible and take no other action at the present time. Modify and reconfigure as may be required in the future as a reasonable accommodation request. It may be necessary to combine the bathrooms into one single user unisex accessible bathroom.	3	3	L	\$0 to \$25,000
<b><u>Dispatch Bathroom</u></b> The phone is located over the grab bars See Photo Police 11.	604	30.8	Relocate the phone so it is not directly above the grab bars thereby interfering with the grab bars use.	3	3	I	Up to \$250

<b>Accessible Jail Cell</b> The cell water closet lacks grab bars. See Photo Police 12.	609	30.8	Install 42" long security style grab bars at the side and back of the water closet. The grab bars should be between 33" and 36" a.f.f.	3	3	N	\$900
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Total up to \$43,035

### Police Station Assessment Photos



Photo Police 1

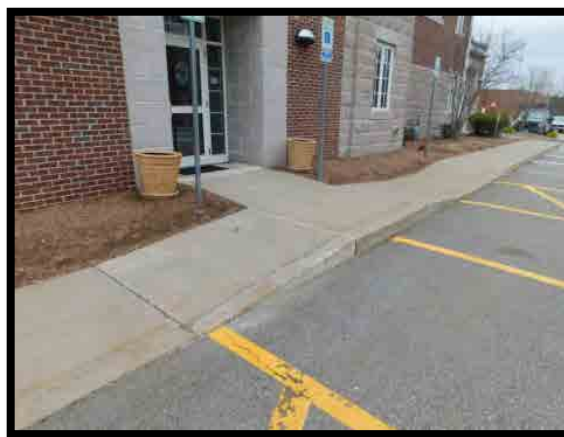


Photo Police 2



Photo Police 3



Photo Police 4



Photo Police 5



Photo Police 6



Photo Police 7



Photo Police 8





Photo Police 9



Photo Police 10



Photo Police 11



Photo Police 12

## **HISTORICAL COMMISSION BUILDING (South Grafton Library)**

**Function and Description of Facility and Programs:** The Grafton Historical Commission uses the former South Grafton Library as its office and to display historic items and artifacts. Constructed in 1938 as a library, the building has had few modifications or renovations over the years.



**Responsible Party:** Board of Selectmen, Historical Commission.

**General Description or Obstacle Which Limits Mobility or Access:** As noted the building has undergone few changes in recent years and as a whole remains non-accessible. A number of modifications are required to achieve compliance under both the 2010 ADA Standards and 521 CMR. There is no designated accessible parking nor is there an accessible entry into the building. The existing entrances (front and rear) have stairs with non-compliant railings. Once inside the building, both the front and rear entrances have a small vestibule with an interior door which opens into the accessible route thereby restricting maneuverability and adequate clear width. Exterior and interior doors have non-complaint hardware. Interior doors lack tactile accessible signage. The bathroom is not accessible and is of inadequate size to achieve minimum required clearances. There is insufficient clear width to the office. The meeting/work table does not provide adequate knee clearance and a cross support for the legs eliminates wheelchair usage. The placement of some furniture and display items reduces the minimum required clear width to less than the required 36".

*Note: The town should hire a design professional to determine the best way to achieve accessibility without compromising the appearance of the building. This could involve converting the rear access into the building as the main entrance including the creating of an on-site accessible parking space, ramped entrance, and modified doors and entryway. Consideration should also be given to constructing an addition at the back of the building to reconfigure the office area and add a fully compliant accessible bathroom.*



## Historical Commission Building (South Grafton Library)

<u>General Description of Obstacle</u>	<u>2010 ADAAG</u>	<u>MAAB 521 CMR</u>	<u>Type of Action to be Taken</u>	<u>P</u>	<u>F</u>	<u>TF</u>	<u>Cost Estimate</u>
<b>Parking</b> There is no accessible parking to the building. <a href="#">See Photo Historic 1.</a>	502 703.7	23	Construct an accessible parking space as follows: stripe and designate a van accessible parking space with van accessible signage at a width of either 11' with a 5' access aisle or 8' with and 8' access aisle (2010 ADA Standards); signage must be set such that the signage height should be a minimum of 60" high at the bottom (2010 ADAAG Standards) and a maximum of 96" at the top (MAAB 521 CMR) and located in front of the space; slopes should not exceed 2% in any direction.	1	3	L	Up to \$25,000
<b>Accessible Entrance</b> Neither the front entrance nor the rear entrance is accessible as entry is via stairs.	402 403 404	20	Construct an accessible route with a ramp and railings to the rear entry in compliance with S.405 (ADA) and S.24 (521 CMR).	1	3	L	Up to \$35,000
<b>Front and Rear Entrance Stairs</b> The railings for the stairs at the front entrance are non-compliant due to the height of the top railing (28" a.f.f.), the lack of a railing on one side and the lack of top and bottom extensions. <a href="#">See Photos Historic 2 and 3.</a>	505.4 505.2 505.10	27.4	Replace or modify existing railings with railings that are between 34" to 38" in height (505.4, 27.4); are located on both sides of the stairs (505.2, 27.4) and have a 12" extension parallel to the ground at the top and an extension sloped the distance of one tread then 12" parallel to the ground (505.10, 27.4)	1	3	N	Up to \$2,500
<b>Front and Rear Entrance</b> The front and rear entrance/vestibule areas are non-compliant as there is only 28" of clear width space. Furthermore, less than 48" of clearance exists between doors when the interior door is opened. A minimum of 48" is required between 2 hinged or pivoted doors, plus the width of any door swinging into the space.	404	25 26	Once a rear accessible entrance is created as the main entrance, remove rear interior vestibule door and provide directional signage at building front noting rear accessible access.	1	2	L	\$100
<b>Door Hardware</b> Exterior and interior door hardware is non-compliant knob-style hardware (rear, interior) or latch (front) – 8 total.	404.2	26.11	Door hardware must be operable with a closed fist or loose grip and shall not require tight grasping or tight pinching of the wrist to operate. Replace knob-style hardware with lever hardware.	1	2	N	\$600
<b>Signage</b> There is no tactile designation signage for 7 interior doors/doorways.	703	41.1	Install accessible compliant designation on the latch side of each door (where allowable) with appropriate finish and contrast and character height and proportions, raised and brailled characters should also be included. Tactile characters on signs s/b 48" min. a.f.f.. from baseline of lowest character and 60" max. a.f.f. to baseline of highest character. Characters must meet the ADA Standards for character height, finish and contrast, accompanied by Grade 2 Braille (703 ADA Standards).	2	2	I	\$245
<b>Bathroom</b> The bathroom is wholly non-complaint with inadequate clearances for wheelchair maneuverability and no accessible components (grab bars, signage, door hardware, compliant heights, etc.). <a href="#">See Photo Historic 4.</a>	603 604 606	30	Discontinue use as a bathroom or modify/construct a space elsewhere to include a bathroom to meet 2010 ADA Standards and 521 CMR Standards for a single user accessible toilet room. Modification will require either partitioning of existing space or the construction of an addition to the rear of the building.	3	4	L	\$50,000 to \$150k+

<b>Tables and Seating</b> The work/meeting table does not provide the required minimum 27" knee clearance and has an obstruction (brace between legs) for wheelchair access. <a href="#">See Photo Historic 5.</a>	226.1 306.3 902.3	35.1 35.5 35.6	At least 5% or not less than 1 table shall be accessible. Tables must provide at least 27" a.f.f. of knee clearance 30" wide and 19" deep (521 CMR). The tops of tables should be 28" to 34" a.f.f. The table should be blocked to meet the required knee clearance height and one brace removed or an accompanying smaller table provided.	2	2	I	\$100
<b>Doorway Widths</b> The doorway to the office provides only 27½" clearance which does not meet the minimum 32" clear width requirement for a doorway. <a href="#">See Photo Historic 6.</a>	404.2	26.5	Modify door opening to comply with minimum 32" wide clear opening.	1	3	N	Up to \$1,850
<b>Maneuverability</b> The clear width is reduced to less than the required 36" around and between some items (tables, desks, display cases, etc.)	403.5	20.3	To the extent possible move items as required to achieve minimum 36" clear width. Under the ADAAG, a clear width of 32" is allowed for a distance of no more than 24"	2	1	I	\$0

Up to \$215,395+

### **Historical Commission Building (South Grafton Library) Assessment Photos**



Photo Historic 1



Photo Historic 2



Photo Historic 3



Photo Historic 4



Photo Historic 5



Photo Historic 6

## **GRAFTON FIRE DEPARTMENT**

**Description of Facility and Programs:** The Grafton Fire Department is a call fire department providing fire suppression, public education, regulation/code compliance and enforcement fire investigation services. The Department consists of a Fire Chief, Deputy Chief, 2 Assistant Chiefs, 3 Captains, 3 Senior Lieutenants, 2 Second Lieutenants, an Office Manager, and numerous fire-fighters. Station 1, the Fire Headquarters and Business Office, is located at 26 Upton Street. Station 2 is located in North Grafton at 2 Mill Street. Station 3 is located in South Grafton at 92 Main Street. The station at 3 Worcester Street has been decommissioned as a Fire Station and is now used by the School Department for storage and as a garage/work facility.



Station #1 – 26 Upton Street



Station #2 – 2 Mill Street



Station #3 – 92 Main Street

**Responsible Party:** Board of Fire Engineers.

**General Description or Obstacle Which Limits Mobility or Access:** The Fire Headquarters (26 Upton Street) is readily accessible for those areas and levels which are open to the public. There is no vertical access to the second level but this area is limited to firefighters, who must meet strict physical

requirements which a person with a mobility limiting disability would not be able to perform. The garage/apparatus bays contains a workshop, bathrooms, a wash down area, storage and related facilities. These areas are also closed to the general public. As no public access is allowed on the second level or in the garage/apparatus area, no further action or modifications are required at the present time. The parking accessible signage is too high. The parking access aisle is 6" too narrow. The approach to the main accessible entrance has running slopes that vary up to 7.5%. A segment of the cement walkway will require railings whereas other portions will need to be removed and re-constructed. . Most of the exterior and interior doors (when applicable) exceed the maximum operating force (15 lbs. – exterior; 5 lbs. – interior) and do not meet the minimum closing speed of 6 seconds. Some light switches, buzzers, phones, and controls exceed the maximum height for a compliant reach range, inclusive of allowed industry tolerances. Some interior doors lack tactile signage or have signage that is not on the latch side of the door. Most glass panels on doors/entries exceed the maximum height under the ADAAG. The kitchenettes in the administrative area and in the "break room" are non-compliant due to reach range, counter height, sink height, and lack of knee clearance. The break room was originally intended to be used solely for fire fighter use and not open to the public. If that continues to be the use and purpose, then no other action is required. If this area is open for public use then modifications will be required. Similarly, the administrative kitchen will require future modifications as a reasonable accommodation if required. The men's, women's and unisex bathrooms all have minor items of non-compliance.

**Station #2** (2 Mill Street) and **Station #3** (92 Main Street) do not comply with 521 CMR or ADAAG accessibility requirements. These stations are closed to the public and no business (permits, trainings, etc.) are conducted out of these stations. All firefighters who use these stations must meet strict physical requirements which a person with a mobility limiting disability would not be able to perform. Therefore no further action on these buildings is required. Should certain functions be reassigned to these stations, including meetings, permit issuance, or other activities, then at a minimum, accessible parking and access into the station offices should be provided.

### **Station#1 (26 Upton Street) Accessibility Assessment**

General Description of Obstacle	2010 ADAAG	MAAB 521 CMR	Type of Action to be Taken	P	F	TF	Cost Estimate
<b>Parking</b> The existing 2 accessible signs are 98 1/2" to 101" a.f.f. at the top which is 2 1/2" to 5" too high.	502	23.6	Signage must be reset such that signage height should be a minimum of 60" high at the bottom (2010 ADAAG Standards) and a maximum of 96" at the top (MAAB 521 CMR) and located in front of each space.	1	2	I	\$0
The accessible parking spaces are 8' 3" to 8' 5" wide with a shared 7' 5" access aisle with both spaces designated as van accessible. See Photo Main Fire 1.	502	23	Restripe parking spaces and access aisle to designate 2 8' wide spaces with a shared 8' wide access aisle.	1	2	I	\$100
<b>Accessible Route to Building from Parking Lot</b> The lower leg of the accessible route (concrete walkway) from the parking lot to the building entrance has running slopes of 6.5% to 6.9% which far exceeds the maximum of 5% for a walkway.	403 405 505	22.3 22.4 24	Install ramp railings on both sides of the lower segment in accordance with S. 405 and S. 505 (ADAAG) and S. 24 (521 CMR) which includes paired railings at a height of 18" – 20" a.f.f. (lower) and 34" – 38" a.f.f. (upper).	1	3	N	Up to \$2,500
Due to settling, heaving, and cracking the concrete pads to the entrance have a running slope of 5.5% to 7.5%. In addition there are also a # of abrupt			Remove concrete pads and replace with pads that comply with maximum 5.0% running slope for a walkway and eliminate all abrupt changes in level surface.	1	3	N	Up to \$3,000

changes in level surface of > ¼" including that created by a water service cover. <a href="#">See Photos Main Fire 2, 3, 4, and 5.</a>							
<b>Exterior and Interior Doors</b> The exterior and interior doors (with closers) do not fully comply with the maximum allowed operating force for an exterior door (15 lbs.) and interior door (5 lbs.) and the minimum closing speed requirement of 6 seconds under 521 CMR.	404.2.8 404.2.9	26.8 26.9	Adjust door closers such that the push/pull force does not exceed 15 lbs for an exterior door and 5 lbs. for an interior door with door closing speeds of at least 6 seconds.	1 2	2	I	\$100
<b>Doors with Glass Panels</b> Interior doors (6) with glass panes that exceed the maximum viewing height of 43" by 1¼" to 1½".	404.2.1 1	NA	Doors, gates, and side lights adjacent to doors or gates, containing panels that permit viewing through the panels shall have the bottom of at least one panel located 43 inches maximum a.f.f. Modify doors/panels to comply with maximum height restriction.	4	3	L	Up to \$1,800
<b>Hallway Controls, Switches, Phones, and Outlets</b> Fourteen (14) Level 1 controls/buzzers, and switches, ten (10) Level 1 phones, and seven (7) outlets exceed the maximum reach range under the 2010 ADA Standards, inclusive of allowed tolerances. <a href="#">See Photo Main Fire 6.</a>	308.2 308.3	6.5 6.6	Lower light switches, outlets, controls/buzzers, phones to no more than 48" a.f.f.	4	3	L	Up to \$9,300+
<b>Hallway Door Signage</b> Tactile designation signage is not provided at administrative entry, apparatus bay (4), and not on the latch side of the door of the meeting room.	703	41.1	Install accessible compliant designation on the latch side of each door (where allowable) with appropriate finish and contrast and character height and proportions, raised and brailled characters should also be included. Tactile characters on signs s/b 48" min. a.f.f.. from baseline of lowest character and 60" max. a.f.f. to baseline of highest character. Characters must meet the ADA Standards for character height, finish and contrast, accompanied by Grade 2 Braille (703 ADA Standards).	2	2	I	\$175
<b>Protruding Objects</b> Office shelving (2) in the administrative area are 40" a.f.f. and extend more than 4" into the accessible route of travel between a height of 27" and 80" a.f.f.	307.2	20.6.1	Place a fixed object under the shelving.	2	1	I	\$0
<b>Administration Kitchenette</b> The counter and sink of the administration kitchenette is 2" too high and does not provide knee clearance. The microwave is at least 14" above reach range. <a href="#">See Photo Main Fire 7.</a>	804.3.2 306.2 306.3 606.3 308.2 308.3	32.2 32.6 32.7 6.5 6.6	Modify the counter and sink so that the height does not exceed 34" a.f.f.; provides a minimum of 27" knee clearance with guarded, wrapped, or insulated piping. A microwave should be available on the counter within reach range.	4	3	L	Up to \$500
<b>Bathrooms (Men's, Women's, Unisex)</b> The toilet paper dispensers are 12" o.c. from the front of the water.  The coat hooks on the stall door are at 54" a.f.f. which exceeds the maximum reach range under ADAAG by 6". <a href="#">See Photo Main Fire 8.</a>	604.7  308 603.4	30.7.6  30.6.1	Toilet paper dispensers s/b 7" minimum and 9" maximum in front of the water closet measured to the centerline of the dispenser. The dispensers s/b a minimum of 24" a.f.f. and not mounted above the grab bars under 521 CMR.  Lower the coat hooks to no more than 48" a.f.f.	3  3	2  2	I  I	\$50  \$0

Up to \$17,525+



**Station #1 (26 Upton Street) Accessibility Assessment Photos**



Photo Main Fire 1

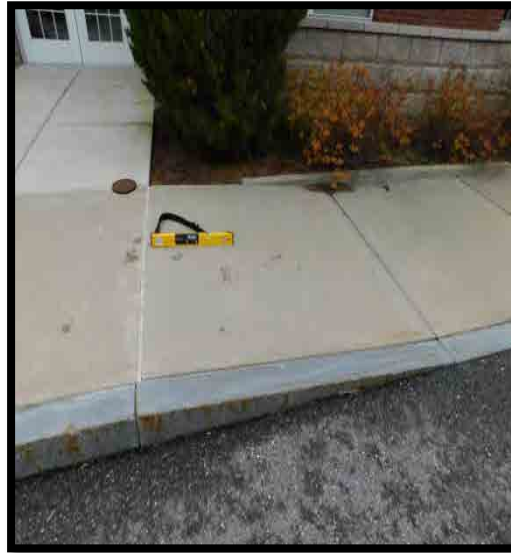


Photo Main Fire 2



Photo Main Fire 3



Photo Main Fire 4



Photo Main Fire 5



Photo Main Fire 6



Photo Main Fire 7



Photo Main Fire 8



## Station#2 (2 Mill Street) Accessibility Assessment

As noted above, if the station is not open to the public and no public activities, programs, or services are offered – no other action is required. Should this change or should the town desire to make the office area accessible, then at a minimum, the following would be required.

General Description of Obstacle	2010 ADAAG	MAAB 521 CMR	Type of Action to be Taken	P	F	TF	Cost Estimate
<b>Parking</b> There is no accessible parking to the building. <a href="#">See Photo Mill Fire 1.</a>	502 703.7	23	Construct an accessible parking space as follows: stripe and designate a van accessible parking space with van accessible signage at a width of either 11' with a 5' access aisle or 8' with and 8' access aisle (2010 ADA Standards); signage must be set such that the signage height should be a minimum of 60" high at the bottom (2010 ADAAG Standards) and a maximum of 96" at the top (MAAB 521 CMR) and located in front of the space; slopes should not exceed 2% in any direction.	1	3	L	Up to \$150
<b>Accessible Route to Building from Parking Space</b> Accessibility into the building is restricted due to a roughly 4" abrupt change in level surface to enter the building. <a href="#">See Photo Mill Fire 2.</a>	403 405 505	22 24	Construct an accessible route with a ramp and railings to the front entrance in compliance with S.405 and S. 505 (ADA) and S.24 (521 CMR). Ramp construction will eliminate level surface change.	1	3	L	Up to \$25,000
<b>Entrance Door</b> The exterior door does not fully comply with the maximum allowed operating force for an exterior door (15 lbs.) and the minimum closing speed requirement of 6 seconds under 521 CMR.	404.2.8 404.2.9	26.8 26.9	Adjust door closer such that the push/pull force does not exceed 15 lbs with a door closing speed of at least 6 seconds.	1	2	L	\$0
<b>Door Hardware</b> Exterior and interior office door hardware is non-compliant knob-style hardware) – 3 total.	404.2	26.11	Door hardware must be operable with a closed fist or loose grip and shall not require tight grasping or tight pinching of the wrist to operate. Replace knob-style hardware with lever hardware.	1 2	2	L	\$225
<b>Signage</b> There is no tactile designation signage for 2 interior office doors/doorways.	703	41.1	Install accessible compliant designation on the latch side of each door (where allowable) with appropriate finish and contrast and character height and proportions, raised and brailled characters should also be included. Tactile characters on signs s/b 48" min. a.f.f.. from baseline of lowest character and 60" max. a.f.f. to baseline of highest character. Characters must meet the ADA Standards for character height, finish and contrast, accompanied by Grade 2 Braille (703 ADA Standards).	2	2	L	\$70

Up to \$25,445

## Station#2 (2 Mill Street) Accessibility Assessment Photos



**Station#3 (92 Main Street) Accessibility Assessment**

As noted above, if the station is not open to the public and no public activities, programs, or services are offered – no other action is required. Should this change or should the town desire to make the office area accessible, then at a minimum, the following would be required.

<b>General Description of Obstacle</b>	<b><u>2010 ADAAG</u></b>	<b><u>MAAB 521 CMR</u></b>	<b><u>Type of Action to be Taken</u></b>	<b><u>P</u></b>	<b><u>F</u></b>	<b><u>TF</u></b>	<b><u>Cost Estimate</u></b>
<b><u>Parking</u></b> There is no accessible parking to the building.  See Photo South Grafton Fire 1.	502 703.7	23	Construct an accessible parking space as follows: stripe and designate a van accessible parking space with van accessible signage at a width of either 11' with a 5' access aisle or 8' with and 8' access aisle (2010 ADA Standards); signage must be set such that the signage height should be a minimum of 60" high at the bottom (2010 ADAAG Standards) and a maximum of 96" at the top (MAAB 521 CMR) and located in front of the space; slopes should not exceed 2% in any direction.	1	3	L	Up to \$150
<b><u>Accessible Route to Building from Parking Space</u></b> Accessibility into the building is restricted due to a roughly 5" abrupt change in level surface to enter the building. There is also a ½" abrupt change in level surface on the accessible route to the entrance.  See Photos South Grafton Fire 2 and 3.	403 405 505	22 24	Construct an accessible route with a ramp and railings to the front entrance in compliance with S.405 and S. 505 (ADA) and S.24 (521 CMR). Ramp construction will eliminate level surface change.	1	3	L	Up to \$25,000
<b><u>Entrance Door</u></b> The exterior door does not fully comply with the maximum allowed operating force for an exterior door (15 lbs.) and the minimum closing speed requirement of 6 seconds under 521 CMR.	404.2.8 404.2.9	26.8 26.9	Adjust door closer such that the push/pull force does not exceed 15 lbs with a door closing speed of at least 6 seconds.	1	2	L	\$0
<b><u>Door Hardware</u></b> Exterior and interior office door hardware is non-compliant knob-style hardware) – 4 total.	404.2	26.11	Door hardware must be operable with a closed fist or loose grip and shall not require tight grasping or tight pinching of the wrist to operate. Replace knob-style hardware with lever hardware.	1 2	2	L	\$300
<b><u>Signage</u></b> There is no tactile designation signage for 4 interior office doors/doorways.	703	41.1	Install accessible compliant designation on the latch side of each door (where allowable) with appropriate finish and contrast and character height and proportions, raised and brailled characters should also be included. Tactile characters on signs s/b 48" min. a.f.f.. from baseline of lowest character and 60" max. a.f.f. to baseline of highest character. Characters must meet the ADA Standards for character height, finish and contrast, accompanied by Grade 2 Braille (703 ADA Standards).	2	2	L	\$140

Up to \$25,590

**Station #3 (92 Main Street) Accessibility Assessment Photos**



Photo South Grafton Fire 1



Photo South Grafton Fire 2



Photo South Grafton Fire 3

## **IX. RECREATIONAL FACILITIES ASSESSMENTS**

Mill Villages Park

Brush Dump Facility

Perry Hill Park

Airport Park

Norcross Park

Nelson Park

Brookmeadow Park

Riverview Park

Fisher Park/Ferry Street Park

Silver Lake Beach

Grafton Town Common/Bandstand

Sidewalks and Curb Ramps

## **Park and Recreation Facilities**

**Overall Facilities:** Grafton Town Common/Bandstand, Silver Lake Beach, Airport Park, Brookmeadow Park, Ferry Street/Fisher Park, Norcross Park, Perry Hill Park, Nelson Park, Riverview Park, Mill Villages Park, Brush Dump Facility, and the Town Common Area and a segment of North Main Street sidewalks and curb ramps.

**Location:** Town-wide.

**General Description of Facilities:** Playgrounds, parks, athletic fields inclusive of public bathrooms, concession stands and other amenities.

**Function:** Children and adult recreation programs.      **Responsible Party:** Recreation Commission.

### **Accessibility Requirements:**

#### **General**

Public spaces, recreational facilities and playgrounds are within the jurisdiction of ADA and 521 CMR and therefore must conform to those standards pertaining to accessible routes, reach ranges, height, knee and toe clearance, operating force, running and cross slopes, clear width, maneuverability and similar standards for ancillary features (bathroom, benches, picnic tables, water fountains, parking, etc.). At a minimum, an accessible route must be provided up to the play or recreation area and then to any play equipment, facilities, bleachers, field, or other amenity or feature.

#### **Walkways**

Walkways in recreation areas include, but are not limited to walks, sidewalks, overpasses, bridges, tunnels, underpasses, plazas, courts, and other pedestrian pathways. Sidewalks on streets and ways are also considered walkways, with the exception that if the slope of the natural topography exceeds 5% (1:20) a ramp is not required.

#### **Playgrounds**

Playgrounds standards are new under the 2010 ADA Standards. Although there are changes being discussed under 521 CMR, currently Massachusetts simply requires an accessible route to and around the play area and to the play equipment. The 2010 ADA Standards are much more expansive and incorporates ground-level components, elevated components, component standards and surface types. **Note:** There is a difference between “ADA Compliant” and “Fully Accessible”. Compliant play structures are generally accessible and are made with the physically disabled in mind. However, fully accessible structures are made specifically for those with disabilities and are typically far more expensive. The language of the ADA makes a distinction between “elevated” and “ground” components. Roughly 25% of a play structure’s components must be on the ground level for it to be ADA compliant. A fully accessible structure has roughly 50% of its components as “ground”. In a fully accessible play system, every component is wheelchair accessible, including elevated areas achieved through the use of ramps.

Although the 2010 ADA Standards do not mandate elevated play equipment, if you have elevated play equipment, then accessible ground level equipment must also be provided.

In addition, the entire play area does not need to be on an accessible surface, but rather the routes of travel to both the play area and the accessible play components must comply with Section 402. Accessible Route and Section 302 Floor or Ground Surfaces (stable, firm, slip resistant) of the 2010 ADA Standards and Section 20 (Accessible Route) and Section 29 (Floor Surfaces) of 521 CMR.

The accessible route connecting ground level components within a play area should be 60” wide with some variation allowed depending on length of travel route and size of play area. The accessible route is preferred, but does not have to be, of the same material or structure as the general route of travel.



Under the 2010 ADA Standards, apart from the actual accessible pathway, there are two types of ground surfaces within the play area. Ground surfaces on accessible routes must comply with the American Society for Testing and Materials (ASTM) F 1951 and the ground surfaces located within the “use zone” must comply with ASTM F 1292. Ground surfaces must be inspected and maintained regularly to ensure continued compliance with the ASTM Standards. The type of surface selected and play area use level will determine the frequency of inspection and maintenance activities.

### Representative Examples of ADA Compliant and Accessible Playgrounds and Play Components



ASTM F 1951 establishes a uniform means to measure the characteristics of surface systems in order to provide performance specifications to be used when selecting materials for use as an accessible surface under and around playground equipment (not the accessible route). Surface methods that comply with this standard and are located in the use zone must also comply with ASTM F 1292 for “impact attenuating” to provide a safe fall area around play equipment.

Within a play area that is not part of an accessible route, turning area or use zone, acceptable materials can include loose fill such as pea gravel, sand, and wood chips. Depending on the fall height of a play structure, materials such as pea gravel, sand, wood chips, shredded rubber and engineered wood fiber all provide different levels of impact attenuation. *Note: The playground play areas throughout Grafton use woodchips within the entirety of the respective playscape areas inclusive of the accessible route of travel. Woodchips are not a compliant material for the accessible route of travel.*

For fully accessible surfaces, pour in place products, rubber mats and tiles, and artificial grass with rubber in-fill all meet ADA standards but are significantly more expensive.

In Massachusetts, public hearings have recently been held to hear comment on sweeping changes to 521 CMR. Significant changes are proposed that would align 521 CMR more with the 2010 ADA Standards including playgrounds and play areas. The proposed surface related changes are noted in red below:

#### **Proposed Changes in 521 CMR**

##### **59.4 Accessible Routes**

An *accessible route* shall be provided to reach playground equipment and around the *perimeter of the* playground *for the following play components:*

*59.4.1 The ground surface of use zones, accessible routes and turning spaces within play areas shall be firm, stable and slip resistant, permanent, and constructed of materials such as rubber resilient surfacing, urethane rubber composites or similar; and comply with commonly accepted impact attenuation criteria for safety surfacing materials within the use zones of play area equipment. Loose fill surfaces and aggregate surfaces including wood fiber, bark mulch, wood chips, shredded rubber, shredded foam, etc. are not acceptable for accessible routes within the playground. Molded rubber mats, if utilized, require adhesion to a permanent surface beneath.*

#### **Americans W/ Disabilities Act (ADA Compliant) Portable Toilet**

Three of the Grafton recreation areas had portable “accessible” toilets. An important distinction to note is that “ADA Compliant” is not synonymous with “Wheelchair Accessible.” Wheelchair Accessible usually indicates a ramped or ground level entrance with a wide enough door for a wheelchair to gain entry. Clearances; setbacks; and dispenser, grab bar, and water closet heights do not necessarily meet ADA or 521 CMR Standards. “ADA Compliant”, however, generally means reinforced construction; ramped or ground level and wheelchair accessible entrance; spring loaded magnetic door that closes automatically; reinforced grab bars; dispensers, grab bars, and the water closet at the proper height or setback; and enough interior space for a wheelchair to make a 360 degree turn. Illustrative examples of an “ADA Compliant” portable toilet are shown on the following page.



### Representative Examples of an ADA Compliant Portable Toilet



### Bleachers

None of the bleachers in the recreation facilities provide adjoining wheelchair seating. A minimum of a 30" by 48" clear floor ground space adjacent to the bleachers as well as a companion seat is required. At least one percent of the seating must be wheelchair seating locations. Each wheelchair seating location is an open, level space that accommodates one person using a wheelchair and has a smooth, stable, and slip-resistant surface. Accessible seating must be an integral part of the seating plan so that people using wheelchairs are not isolated from other spectators or their friends or family. As bleachers are replaced due to age or condition, more accessible bleacher seating as shown below should be provided.



**Park and Recreation Cost Estimates:** The cost estimates provided for each park/recreation facility are rough parameters of cost based on pricing for similar work as well as estimated costs for certain types of modifications. Actual costs on some items may vary considerably due to unforeseen conditions and/or design alternatives. If the required modifications require design solutions, additional architectural and/or engineering fees may be required. In addition, if the work must be formally bid to private contractors, additional costs (bonds, insurance, prevailing wage) will also increase the overall cost. Depending on complexity, suggested base costs could increase up to an additional 30.5% as a total project cost.

## MILL VILLAGES PARK



**Description of Facility:** Local historical park with interpretive signage and markers, a pavilion, picnic tables and benches. The park includes fully compliant accessible parking and an accessible walkway connecting internal park elements.

**General Description or Obstacle Which Limits Mobility or Access:** Two interpretive signs/markers are not on an accessible route of travel. Although the benches are on an accessible route, there is no companion wheelchair space. None of the picnic tables are handicapped accessible. Abrupt changes in level surface occur in the cement walkway closest to the street due to the lack of brick pavers inlaid into the walkway.

### Mill Villages Park Accessibility Assessment

<u>General Description of Obstacle</u>	<u>2010 ADAAG</u>	<u>MAAB 521 CMR</u>	<u>Type of Action to be Taken</u>	<u>P</u>	<u>F</u>	<u>TF</u>	<u>Cost Estimate</u>
An accessible route needs to be provided to the interpretive sign and stone markers near the canal. <a href="#">See Photos Mill Villages 1 and 2.</a>	402 802.1	20.0 19.0	Construct an accessible route compliant with width and slope (2% cross, 5% running) requirements to the interpretive sign and stone marker. Construction options can include compacted stone dust or similar surfaces that meet the requirement of stable, firm, and slip resistant.	1	3	N	\$500
None of the fourteen (14) benches have a wheelchair designated space. <a href="#">See Photo Mill Villages 3.</a>	402 802.1	19.0 20.0	At a minimum, construct a 60" x 36" wheelchair area with compliant slope requirements (no more than 2%) next to at least 5% or one (1) bench.	1	3	N	\$350

None of the three (3) existing picnic tables provide the required accessible knee and toe clearance. <b>See Photo Mill Villages 4.</b>	226.1 902	19.5.2 19.6.2	At least 5% or at least one table must be accessible. Purchase one accessible picnic table to be placed under the pavilion. The table surface s/b 28" to 34" a.f.f. to the top surface with at least 27" knee clearance, 30" clear width, and 19" depth.	1	1	N	\$750
The cut-out for the brick pavers result in an abrupt change in level surface of more than ¼" due to the lack of brick. A larger than typical gap between concrete pads on the street side result in an abrupt change in level surface. <b>See Photos Mill Villages 5 and 6.</b>	403.4	22.4	Infill the cut-out with brick or a related material to eliminate abrupt change. Infill or seal the gap between concrete pads.	1	2	N	\$100

**Estimated Total Cost:** Up to \$1,700 +/-

### **Mill Villages Assessment Photos**



Photo Mill Villages 1



Photo Mill Villages 2



Photo Mill Villages 3



Photo Mill Villages 4



Photo Mill Villages 5



Photo Mill Villages 6

## **BRUSH DUMP FACILITY**

**Function and Description of Facility and Programs:** The Grafton Brush Disposal Area is open to Grafton residents by sticker on a part-time basis on weekdays and on Saturday mornings. It serves solely as a drop off area for brush, leaves, and other similar clean yard waste. There are no built structures and no other facilities or services are available.

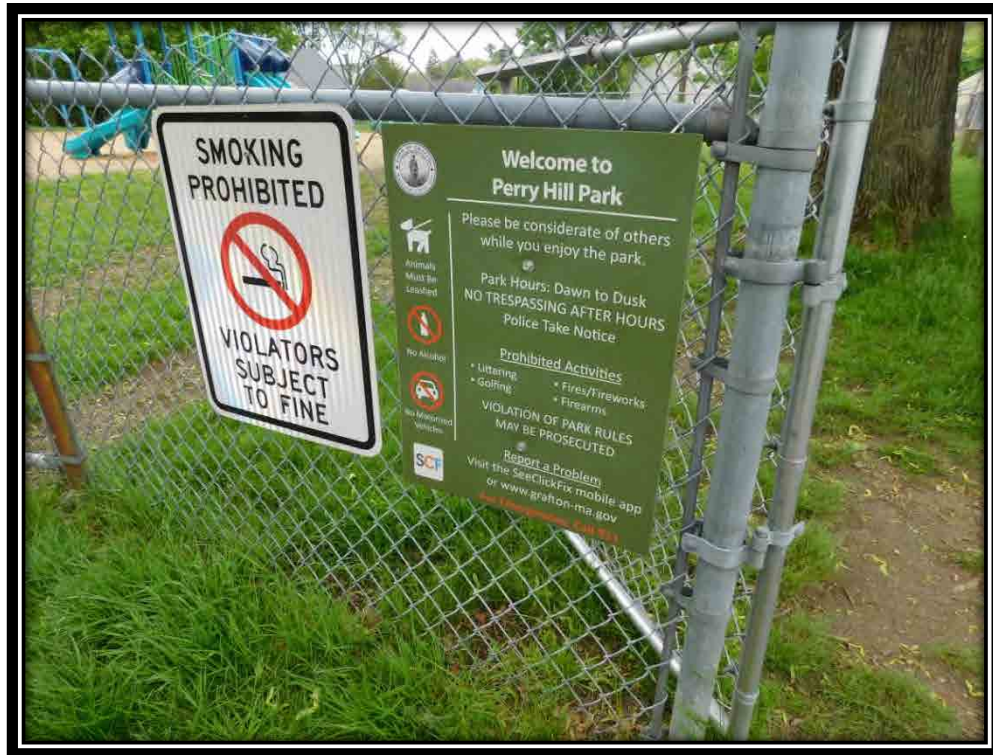


**Responsible Party:** Department of Public Works

**General Description or Obstacle Which Limits Mobility or Access:** Because of the type of use and operation, no modifications are required other than to ensure that there is assistance when needed. Personnel should be available during the times of operation to assist anyone with the proper disposal of their materials. Signage should also be provided at the entrance to instruct those in need how to obtain assistance. Cost for signage could vary up to \$150 depending on size and construction.



## PERRY HILL PARK



**Description of Facility:** Neighborhood playground with a play structure, play components, benches, and a picnic table. An apparent basketball court is overgrown, and consists of only one basketball hoop.

**General Description or Obstacle Which Limits Mobility or Access:** There is no accessible route to and within the playground area. There is an abrupt change in level surface at the main gated entrance with the interior consisting of non-compliant wood chips. None of play components nor the picnic table are accessible. There is no accessible route to the “basketball court/hoop”. Due to the deteriorated nature of the court and basketball hoop, coupled with the cost to achieve accessibility compliance, the use of this area should be discontinued.

### Perry Hill Park Accessibility Assessment

<u>General Description of Obstacle</u>	<u>2010 ADAAG</u>	<u>MAAB 521 CMR</u>	<u>Type of Action to be Taken</u>	<u>P</u>	<u>F</u>	<u>TF</u>	<u>Cost Estimate</u>
There is a change in level surface of > ¼” at the entrance to the playground area due to exposed tree roots. <b>See Photo Perry Hill 1.</b>	303 403.3 403.4	22.3 22.4	Remove the tree root to create a level surface.	1	2	N	\$250
The gate to the playground does not comply with the 2010 ADA Standards for a smooth surface within 10 inches of the ground on the push side for the full width of the gate. <b>See Photo Perry Hill 2.</b>	404.2	NA	Remove gates or install smooth plating at base of gate.	1	2	N	Up to \$200

No accessible route exists within the play area to ground level components, the primary play structure, benches, and to the sole picnic table. No accessible route exists around the perimeter of the play area. <a href="#">See Photos Perry Hill 3, 4, and 5.</a>	402 1008.2	19.7 20.0	Construct an accessible route compliant with width and slope (2% cross, 5% running) requirements around the perimeter of the play area (4' wide minimum) and to the play structure elements (stairs, slide base, etc.) and to the ground components (5' wide minimum). The accessible route must be stable, firm, and slip resistant. Construction options include compacted stone dust, asphalt, concrete, poured in place products, etc. Costs will vary depending on product used. Accessible playscape and ground components should be added. The benches and picnic table s/b located on an accessible route.  Play area ground surfaces must comply with ASTM F 1951 and ASTM F 1292.	1	3	N	Up to \$35,000
The benches lack level surface areas for wheelchairs.	221.2 802.1	14 19	Create an approach and wheelchair companion area at one of the benches. Spaces should be 36" wide x 60" deep per wheelchair. If paired, spaces can be reduced to 33" in width. If a front/rear approach, the depth can be reduced to 48" as opposed to 60" for a side approach.	2	3	N	\$350
The existing picnic table does not provide the required accessible knee and toe clearance. <a href="#">See Photo Perry Hill 6.</a>	226.1 902	19.5.2 19.6.2	At least 5% or at least one table must be accessible. Replace the existing table or provide an additional one which has a table surface of between 28" to 34" a.f.f. to the top surface with at least 27" knee clearance, 30" clear width, and 19" depth.	2	1	N	\$750

**Estimated Total Cost:** Up to \$36,550 +/-

### Perry Hill Park Assessment Photos



Photo Perry Hill 1



Photo Perry Hill 2





Photo Perry Hill 3



Photo Perry Hill 4



Photo Perry Hill 5



Photo Perry Hill 6

## **AIRPORT PARK**



**Description of Facility:** Larger recreation area including parking, baseball fields, bleacher seating, batting/pitching cage, basketball court, playground with a play structure and play components, picnic table, 2 benches, and a non-compliant “accessible” portable toilet.

**General Description or Obstacle Which Limits Mobility or Access:** There is no accessible signage for the designated accessible spaces. None of the spaces are designated as van accessible. A passenger car accessible space has a less than 5’ access aisle. There is no accessible route to and within the recreation facility to various elements. There is an abrupt change in level surface and excessive slope at the main gated entrance. Although the playground area was under renovation at the time of the site visit, none of the existing play components are accessible. The entry gate into the playground area does not have a smooth surface at the base. There is no accessible route around or within the playground area including to the play components and benches. Wood chips were stockpiled in the parking lot with an apparent intention to be dispersed in the playground area. A picnic table near the playground is not on an accessible route nor is the table itself accessible. An “accessible” portable toilet is not on an accessible route. The “accessible” portable toilet is not ADA compliant. The portable toilet lacks sufficient interior space for a 360 degree turn, does not meet water closet setback and clearance requirements, and does not meet dispenser height requirements. There is a non-compliant abrupt change in level surface to the player’s seating area at the ball field closest to the parking lot.

## Airport Park Accessibility Assessment

<u>General Description of Obstacle</u>	<u>2010 ADAAG</u>	<u>MAAB 521 CMR</u>	<u>Type of Action to be Taken</u>	<u>P</u>	<u>F</u>	<u>TF</u>	<u>Cost Estimate</u>
None of the designated accessible spaces have accessible signage. No spaces are noted as van accessible. The access aisle to one space is less than 5' wide. <a href="#">See Photo Airport Park 1.</a>	502.2 502.3 502.6 208.2.4	23.4.1 23.4.6 23.4.7 23.6	Restripe the parking spaces and access aisle to the right of the entrance such that there is at least one van accessible (11' wide - 5' access aisle or 8' wide - 8' access aisle) and the other is car accessible (8' wide - 5' access aisle). Provide signage (one van, two passenger vehicles) at a height of at least 60" a.f.f. to sign bottom nor more than 96" to the sign top and no more than 10' from the front of the parking space.	1	2	I	\$350
There is a change in level surface of 1" to 2" and a running slope of approximately 11.5% at the entrance to the recreation area. <a href="#">See Photo Airport Park 2.</a>	303 403.3 403.4	22.3 22.4	Modify the gate entrance so that there is a no greater than ¼" abrupt change in level surface and a running slope of no greater than 5%.	1	3	N	Up to \$2,500
The gate to the playground does not comply with the 2010 ADA Standards for a smooth surface within 10 inches of the ground on the push side for the full width of the gate. <a href="#">See Photo Airport Park 3.</a>	404.2	NA	Remove gates or install smooth plating at base of gate.	1	2	N	Up to \$200
The "accessible" toilet is not ADA compliant as the soap dispenser is more than 42" high (521 CMR), the toilet paper is above the reach range, the rim of the toilet seat is greater than 18" a.f.f., there is insufficient near and far wall clearance, insufficient clearance at the front of the toilet, and a door closing speed that is only 2 seconds.	308.2 308.3 604.7 309.4 604.4 604.2 404.2.8	30.12 30.7.6 30.8.5 30.7.2 30.7.2 26.9	Replace the existing "accessible" toilet with an "ADA Compliant" toilet such that soap/towel dispensers are no more than 42" a.f.f.; the toilet paper dispenser s/b a minimum of 24" a.f.f. and s/b 7" min. to 9" max. in front of the water closet measured to the centerline of the dispenser; the height of the water closet s/b 17" to 19" a.f.f. to the top of the seat; the water closet s/b 18" from the nearest sidewall, at least 42" from the farthest sidewall, and 42" from the front of the water closet to the nearest wall or fixture; and a door closing speed that is at least 6 seconds	3	2	I	TBD
No accessible route exists to the ball fields and player benches, bleachers, basketball court, accessible portable toilet, picnic table, and to the playground. An abrupt change in level surface of approximately 2" occurs at the entrance to the player's seating area at the ball field closest to the parking lot. <a href="#">See Photos Airport Park 4 and 5.</a>	402 303 403.3 403.4	19.0 20.0 22.4	Construct an accessible route to the ball fields and player benches, bleachers, basketball court, accessible portable toilet, picnic table, and playground compliant with width and slope (2% cross, 5% running) requirements. As part of the accessible route to the player's seating, modify to eliminate the level surface change.	1	3	L	Up to \$25,000
No accessible route exists within the play area to ground level components, the primary play structures, and benches. No accessible route exists around the perimeter of the play area. <a href="#">See Photo Airport Park 3.</a>	402 1008.2 226.1 802.1	19.7 20.0 14 19	Construct an accessible route compliant with width and slope (2% cross, 5% running) requirements around the perimeter of the play area (4' wide minimum) and to the play structure elements (stairs, slide base, etc.) and to the ground components (5' wide minimum). The accessible route must be stable, firm, and slip resistant. Construction options include compacted stone dust, asphalt, concrete, poured in place products, etc. Costs will vary depending on product used. Accessible playscape and ground components should be added. The benches s/b located on an accessible route with wheelchair companions areas (see below). Play area ground surfaces must comply with ASTM F 1951 and ASTM F 1292.	1	3	L	Up to \$40,000



The existing picnic table does not provide the required accessible knee and toe clearance. <b>See Photo Airport Park 6.</b>	226.1 902	19.5.2 19.6.2	At least 5% or at least one table must be accessible. Replace the existing table or provide an additional one which has a table surface of between 28" to 34" a.f.f. to the top surface with at least 27" knee clearance, 30" clear width, and 19" depth.	2	1	N	\$750
The bleachers lack level surface areas for wheelchairs.	221.2 802.1	14 19	Create an approach and wheelchair companion area at the bleachers. Spaces should be 36" wide x 60" deep per wheelchair. If paired, spaces can be reduced to 33" in width. If a front/rear approach, the depth can be reduced to 48" as opposed to 60" for a side approach.	2	3	N	\$700

Estimated Total Cost: Up to \$69,500

### Airport Park Assessment Photos



Photo Airport Park 1



Photo Airport Park 2



Photo Airport Park 3



Photo Airport Park 4



Photo Airport Park 5



Photo Airport Park 6

## **NORCROSS PARK**



**Description of Facility:** Larger recreation area including parking, Edward P. Miner Field; ballfield seating; bathroom facilities; a batting cage; a basketball court; and a playground with a play structure and play components, including 3 picnic tables, and a bench.

**General Description or Obstacle Which Limits Mobility or Access:** None of the accessible parking spaces are designated as van accessible. The accessible parking space signage closest to the park is 6" too high. The cross slopes of the parking spaces and access aisles vary up to 2.5% in areas, which exceeds the maximum of 2.0%. When the parking area is resurfaced in the future, this should be corrected. There is no accessible route to and within the recreation facility to various elements. The playground has minimal accessible play components. The entry gates into the playground area, ball field (2), and batting cage do not have a smooth surface at the base. The clear width to the batting cage is reduced to 25" due to an exposed concrete base. There is no accessible route around or within the playground area including to the play components, 3 picnic tables, and bench. None of the picnic tables are accessible. Non-compliant wood chips are the primary surface throughout the playground. A bench near the basketball court is not on an accessible route. Both bathrooms at the Edward P. Miner Field have a number of non-compliant elements including door operating force, door closing speed, location of accessible tactile signage, water closet setbacks, mirror heights, grab bar heights, location of toilet paper dispensers, and location of water closet flush valve.

## Norcross Park Accessibility Assessment

<u>General Description of Obstacle</u>	<u>2010 ADAAG</u>	<u>MAAB 521 CMR</u>	<u>Type of Action to be Taken</u>	<u>P</u>	<u>F</u>	<u>TF</u>	<u>Cost Estimate</u>
No spaces are noted as van accessible. The access aisle is not wide enough for a van. The sign closest to the ball field is 6" too high. <b>See Photo Norcross Park 1.</b>	502.2 502.3 502.6 208.2.4	23.4.1 23.4.6 23.4.7 23.6	Restripe the parking spaces and access aisle such that there is at least one van accessible (11' wide - 5' access aisle or 8' wide - 8' access aisle) and the other is car accessible (8' wide - 5' access aisle). Provide van accessible signage at a height of at least 60" a.f.f. to the sign bottom nor more than 96" to the sign top and no more than 10' from the front of the parking space.	1	2	I	\$350
There is a change in level surface of ½" and a 1½" gap from the asphalt to concrete transition on the accessible route to Miner Field. The top 15' of the walkway has a running slope that varies from 5% to 10%, which exceeds that allowed for a walkway. <b>See Photo Norcross Park 2.</b>	303 403.3 403.4 405.8 505	22.3 22.4 24.5	Modify the accessible route entrance so that there is a no greater than ¼" abrupt change in level surface and the 1½" gap is eliminated. For the top segment of the walkway that exceeds a 5% running slope, provide paired railings at 34" - 38" a.f.f. (top), 18" - 20" a.f.f. (bottom); oval/round in shape; and with an outside diameter of 1½" - 2".	1	3	N	Up to \$4,250
The gate to the base ball field (2), batting cage, and to playground does not comply with the 2010 ADA Standards for a smooth surface within 10 inches of the ground on the push side for the full width of the gate. <b>See Photo Norcross Park 3.</b>	404.2	NA	Remove gates or install smooth plating at base of gate.	1	2	N	Up to \$800
The clear width at the entrance to the batting cage is reduced to 25" due to exposed concrete at the base of post gate. <b>See Photo Norcross Park 4.</b>	402 403	20	Reset entrance post and/or remove portions of concrete base to achieve minimum 36" clear width.	1	2	N	\$100
There is a change in level surface of 1" into the playground as well as a 26.4% slope from the parking lot due to a curb ramp. <b>See Photo Norcross Park 5.</b>	303 403.3 403.4	22.3 22.4	Modify the accessible route so that there is a no greater than ¼" abrupt change in level surface. Make a cut in the curb ramp to eliminate the excessive slope.	1	2	N	Up to \$250
No accessible route exists to the batting cage, basketball court, basketball court benches, and to the playground. <b>See Photo Norcross Park 6.</b>	402 303 403.3 403.4 802.1 221.2	19.0 20.0 22.4 14 19	Construct an accessible route to the batting cage, basketball court, benches, and playground compliant with width and slope (2% cross, 5% running) requirements. Create an approach and wheelchair companion area at the benches. Spaces should be 36" wide x 60" deep per wheelchair. If paired, spaces can be reduced to 33" in width. If a front/rear approach, the depth can be reduced to 48" as opposed to 60" for a side approach.	1	3	L	Up to \$10,000
No accessible route exists within the playground area to ground level components, the primary play structures, and benches. No accessible route exists around the perimeter of the play area. <b>See Photos Norcross Park 7 and 8.</b>	402 1008.2	19.7 20.0 14 19	Construct an accessible route compliant with width and slope (2% cross, 5% running) requirements around the perimeter of the play area (4' wide minimum) and to the play structure elements (stairs, slide base, etc.) and to the ground components (5' wide minimum). The accessible route must be stable, firm, and slip resistant. Construction options include compacted stone dust, asphalt, concrete, poured in place products, etc. Costs will vary depending on product used. Accessible playscape and ground components should be added. Both the bench and the trash receptacle s/b located on an accessible route. The bench should have a wheelchair companion areas (see above). Play area ground surfaces must comply with ASTM F 1951 and ASTM F 1292.	1	3	L	Up to \$40,000

The playground picnic tables do not provide the required accessible knee and toe clearance. <b>See Photo Norcross Park 9.</b>	226.1 902	19.5.2 19.6.2	At least 5% or at least one table must be accessible. Replace one picnic table or provide an additional one which has a table surface of between 28" to 34" a.f.f. to the top surface with at least 27" knee clearance, 30" clear width, and 19" depth and on an accessible route.	2	1	N	\$750
<u>Men's and Women's Bathrooms</u> The entry doors accessible tactile designation signage is mounted too high and is not on the latch side of the door.	703	41.1	Install accessible compliant designation on the latch side of the doors with appropriate finish and contrast and character height and proportions, raised and brailled characters should also be included. Tactile characters on the sign s/b 48" min. a.f.f.. from baseline of lowest character and 60" max. a.f.f. to baseline of highest character. Characters must meet the ADA Standards for character height, finish and contrast, accompanied by Grade 2 Braille (703 ADA Standards). Install lever hardware on the interior door.	3	2	I	\$125
The bathroom doors push/pull force is 26 lbs. and has a 2-3 seconds closing speed	404.2.9 404.2.8	26.8 26.9	Adjust or replace door closers such that the push/pull forces do not exceed 5 lbs. and door closing speed is at least 6 seconds (521 CMR).	3	2	I	\$50
The wall mounted mirrors (44-45" a.f.f.) are 4-5" too high.	603.3	30.11	Lower mirrors such that the bottom of the mirror (reflecting surface) is no greater than 40" a.f.f.	3	2	I	\$50
The grab bars are mounted 1" too high in the men's bathroom and ¼" to ¾" too high in the women's bathroom. <b>Note:</b> No tolerances are allowed for ranges.	609.4	30.8.2	Lower grab bars such that the top of the gripping surface is 33" to 36" a.f.f.	3	2	I	\$50
The toilet paper dispensers are 20" a.f.f. and 9" to 12" o.c. from the front of the water closet.	604.7 309.4	30.7.6 30.8.5	Toilet paper dispenser s/b 7" minimum and 9" maximum in front of the water closet measured to the centerline of the dispenser. The dispenser s/b a minimum of 24" a.f.f. and not mounted above the grab bars under 521 CMR.	3	2	I	\$150
The water closet does not comply with the nearest and farthest sidewall setback requirements of 18" (near) and at least 42" (far) under 521 CMR as the water closet is 19½" from the near wall and 39½" from the far wall. In addition, the flush valve is not on the approach side. <b>See Photos Norcross Park 10, 11, and 12.</b>	604.2 604.6	30.7.2 30.7.5	Relocate existing water closets to comply with 18" to the water closet centerline from the nearest sidewall and 42" minimum to the center line of the water closet from the farthest wall (521 CMR). Reverse the water tank/flush valve from the men's to the women's bathrooms so that the flush valve is located on the approach or wide side.	3	3	N	Up to \$2,000

**Estimated Total Cost:** Up to \$58,925



## Norcross Park Assessment Photos



Photo Norcross Park 1



Photo Norcross Park 2



Photo Norcross Park 3



Photo Norcross Park 4



Photo Norcross Park 5



Photo Norcross Park 6



Photo Norcross Park 7



Photo Norcross Park 8



Photo Norcross Park 9



Photo Norcross Park 10



Photo Norcross Park 11



Photo Norcross Park 12

## NELSON PARK



**Description of Facility:** Larger park area including 3 softball/baseball fields, a playground/playscape, a basketball court, picnic tables, benches, and a building housing a concession stand and bathrooms.

**General Description or Obstacle Which Limits Mobility or Access:** There is no designated accessible parking on the Nelson Park Complex. The counter at the concession stand is 5" too high. The "accessible route" to the bathrooms and concessions has excessive cross slopes well in excess of the maximum 2.0% and has an abrupt change in level surface of roughly 1" at the top approach to the building.

There is no accessible route to and within Nelson Park to various elements including the baseball/softball fields, player benches, bleacher seating, public benches, picnic tables, basketball court, and playground. The playground has minimal accessible play components. There is no accessible route around or within the playground area including to the play components and benches. Non-compliant wood chips are the primary surface throughout the playground area. None of the picnic tables provide compliant clear width or knee/toe clearance. Five of the six player ball field player benches have an abrupt change in level surface of nearly 2" to access the bench area. The bleachers lack accessible wheelchair companion seating. Railings should be provided at the bleachers where feasible. Bathrooms have a number of non-compliant elements including door operating force, door closing speed, location of accessible tactile signage, abrupt changes in level surface at the door threshold, unwrapped sink piping, dispenser heights, and grab bar setbacks.



## Nelson Park Accessibility Assessment

<u>General Description of Obstacle</u>	<u>2010 ADAAG</u>	<u>MAAB 521 CMR</u>	<u>Type of Action to be Taken</u>	<u>P</u>	<u>F</u>	<u>TF</u>	<u>Cost Estimate</u>
Although there is no parking at Nelson Park other than at the library (inclusive of accessible parking), the creation of accessible parking on-site would minimize the cost for an accessible route of travel.	502 703.7	23	Utilize the existing rudimentary driveway to the concession/bathrooms – improve the driveway and create a van accessible space as follows: stripe and designate a van accessible parking space with van accessible signage at a width of either 11' with a 5' access aisle or 8' with and 8' access aisle (2010 ADA Standards); signage must be set such that the signage height should be a minimum of 60" high at the bottom (2010 ADAAG Standards) and a maximum of 96" at the top (MAAB 521 CMR) and located in front of the space; slopes should not exceed 2% in any direction.	1	3	N	Up to \$15,000
There is a change in level surface of roughly 1" at the top concrete pad to the bathrooms/concessions. The cross slopes at the lower and top of the accessible route vary from 2.4% to 4.6%. See Photo Nelson Park 1.	303 403.3 403.4	22.3 22.4	Reconstruct the 3 segments of affected concrete of the accessible route such that there is a no greater than a ¼" abrupt change in level surface at the top and the cross slopes do not exceed 2.0%.	1	3	N	Up to \$500
The counter at the concession window is 5" too high at 39" a.f.f. See Photo Nelson Park 2.	904.5	17.6.2	Create a 36" wide counter no higher than 34" a.f.f. below the existing counter.	1	2	N	Up to \$500
There is no tactile designation signage at the door to the concessions.	703	41.1	Install accessible compliant designation signage on the latch side of the door with appropriate finish and contrast and character height and proportions, raised and brailled characters should also be included. Tactile characters on signs s/b 48" min. a.f.f. from baseline of lowest character and 60" max. a.f.f. to baseline of highest character. Characters must meet the ADA Standards for character height, finish and contrast, accompanied by Grade 2 Braille (703 ADA Standards).	2	2	I	\$35
None of the picnic tables (3 scattered, 3 at concessions area) do not provide the required accessible knee and toe clearance and are not on an accessible route. See Photo Nelson Park 3.	226.1 902	19.5.2 19.6.2	At least 5% or at least one table must be accessible. Replace one picnic table or provide an additional one which has a table surface of between 28" to 34" a.f.f. to the top surface with at least 27" knee clearance, 30" clear width, and 19" depth and on an accessible route. At least one accessible table s/b located at the concession area and one scattered site.	2	1	N	\$1,500
No accessible route exists to the basketball court, ball fields, player benches, bleachers, and to the playground. Five of the six ball field player benches have an abrupt change in level surface of nearly to 2". See Photos Nelson Park 4, 5, and 6.	402 303 403.3 403.4 802.1 221.2	19.0 20.0 22.4 14 19	Construct an accessible route to the basketball court, ball fields, player benches, bleachers, and playground compliant with width and slope (2% cross, 5% running) requirements and abrupt change in level surface requirements (no greater than ¼" unbeveled). Create an approach and wheelchair companion area at the bleachers. Spaces should be 36" wide x 60" deep per wheelchair. If paired, spaces can be reduced to 33" in width. If a front/rear approach, the depth can be reduced to 48" as opposed to 60" for a side approach.	1	3	L	Up to \$34,000+
No accessible route exists within the playground area to ground level components, the primary play structures, and benches. No accessible route exists around the perimeter of the play area. There are no accessible	402 1008.2	19.7 20.0 14 19	Construct an accessible route compliant with width and slope (2% cross, 5% running) requirements around the perimeter of the play area (4' wide minimum) and to the play structure elements (stairs, slide base, etc.) and to the ground components (5' wide minimum). The accessible route must be stable, firm, and slip resistant.	1	3	L	Up to \$30,000

play components. Non-compliant wood mulch is the sole surface treatment for the play area. <a href="#">See Photo Nelson Park 7.</a>			Construction options include compacted stone dust, asphalt, concrete, poured in place products, etc. Costs will vary depending on product used. Accessible playscape and ground components should be added. The benches s/b located on an accessible route. At least one bench should have a wheelchair companion area (see above). Play area ground surfaces must comply with ASTM F 1951 and ASTM F 1292.				
<u>Unisex and Women's Bathrooms</u> The entry doors lack accessible tactile designation signage on the latch side of the door.	703	41.1	Install accessible compliant designation on the latch side of the doors with appropriate finish and contrast and character height and proportions, raised and brailled characters should also be included. Tactile characters on the sign s/b 48" min. a.f.f. from baseline of lowest character and 60" max. a.f.f. to baseline of highest character. Characters must meet the ADA Standards for character height, finish and contrast, accompanied by Grade 2 Braille (703 ADA Standards). Install lever hardware on the interior door.	3	2	I	\$125
The bathroom entry doors push/pull force is greater than 5 lbs. and has a 2-3 seconds closing speed	404.2.9 404.2.8	26.8 26.9	Adjust or replace door closers such that the push/pull forces do not exceed 5 lbs. and door closing speed is at least 6 seconds (521 CMR).	3	2	I	\$50
There is an abrupt change in level surface of roughly 1" at the thresholds to the bathrooms. <a href="#">See Photo Nelson Park 8.</a>	404.2	26.10	Modify threshold such that there is no greater than a ¼" unbeveled abrupt change in level surface at the bathroom entrances.	3	3	N	Up to \$900
The sink piping is not wrapped, guarded, or insulated. <a href="#">See Photo Nelson Park 9.</a>	606.5	30.9.5	Wrap or insulate piping.	3	2	I	\$100
The towel dispensers (53" a.f.f. over a 24" counter obstruction) are outside the zone of reach under 521 CMR. The unisex bathroom toilet seat dispenser is 18" too high.	308.2 308.3	30.12 6.5 6.6	Lower dispensers to a max. of 42" a.f.f. (521 CMR) and within the zone of reach.	3	2	I	\$0
The toilet paper dispensers are 20" a.f.f. and 13" o.c. from the front of the water closet.	604.7	30.7.6	Relocate toilet paper dispensers such that they are 7" minimum and 9" maximum in front of the water closet measured to the centerline of the dispenser. The dispensers s/b a minimum of 24" a.f.f. and not mounted above the grab bars.	3	2	I	\$0
The women's bathroom rear grab bars are mounted 6" too far from the inside corner.  <a href="#">See Photo Nelson Park 10.</a>	604.5 609.4	30.8.1	Move rear grab bar so that it is no more than 6" from the interior corner.	3	2	I	\$0

**Estimated Total Cost:** Up to \$82,710

## Nelson Park Assessment Photos



Photo Nelson Park 1



Photo Nelson Park 2



Photo Nelson Park 3



Photo Nelson Park 4



Photo Nelson Park 5



Photo Nelson Park 6



Photo Nelson Park 7

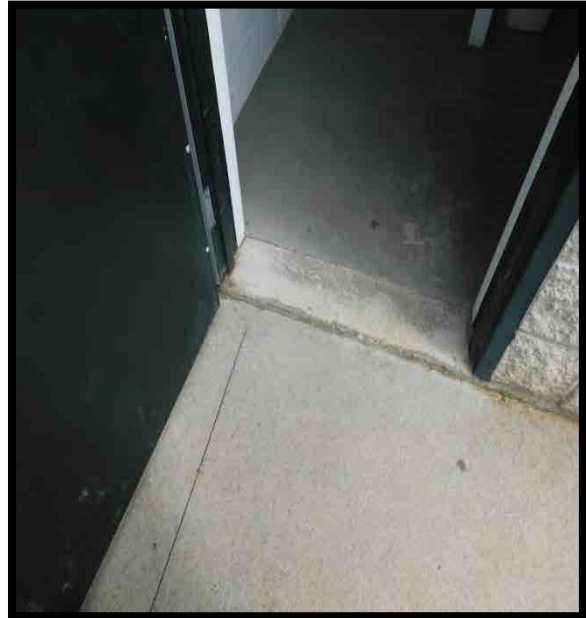


Photo Nelson Park 8

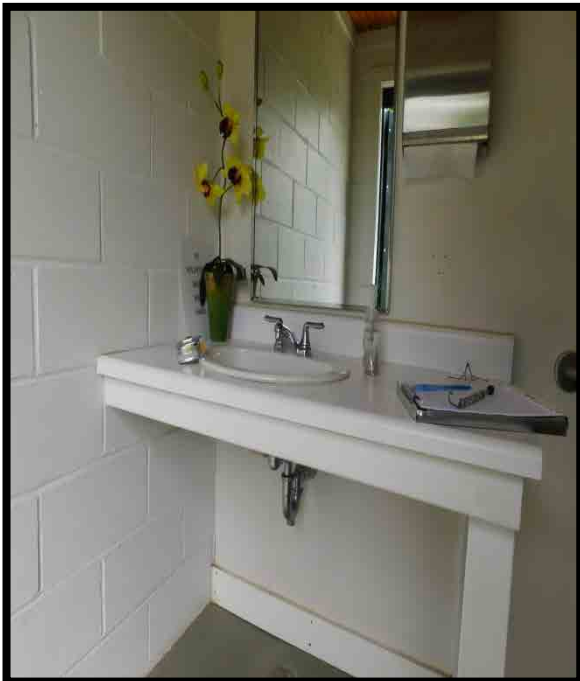


Photo Nelson Park 9



Photo Nelson Park 10



## **BROOKMEADOW PARK**



**Description of Facility:** Smaller recreation area including parking, a baseball field with player benches, bleachers, soccer fields, a non-accessible picnic table, and a non-compliant “accessible” portable toilet.

**General Description or Obstacle Which Limits Mobility or Access:** An additional accessible parking space is required (3 accessible required for 51 to 75 total # of spaces). There is no van designated accessible space. One of the accessible parking signs is 2” too low. There is no accessible route to and within the recreation facility to various elements. A picnic table near the parking is not on an accessible route nor is the table itself accessible. The bleachers lack accessible companion seating. A 6” board creates an abrupt change in level surface and an obstruction into the baseball player seating. The “accessible” portable toilet is not ADA compliant. The portable toilet lacks sufficient interior space for a 360 degree turn, does not meet water closet setback and clearance requirements, and does not meet dispenser height requirements.

### **Brookmeadow Accessibility Assessment**

<b><u>General Description of Obstacle</u></b>	<b><u>2010 ADAAG</u></b>	<b><u>MAAB 521 CMR</u></b>	<b><u>Type of Action to be Taken</u></b>	<b><u>P</u></b>	<b><u>F</u></b>	<b><u>TF</u></b>	<b><u>Cost Estimate</u></b>
An additional accessible space is required. No spaces are noted as van accessible. An existing sign is 2” too low.. <a href="#">See Photo Brookmeadow 1.</a>	502.2 502.3 502.6 208.2.4	23.4.1 23.4.6 23.4.7 23.6	Create a van accessible (11’ wide - 5’ access aisle or 8’ wide – 8’ access aisle) with van accessible signage. All signage at a height of at least 60” a.f.f. to sign bottom nor more than 96” to the sign top and no more than 10’ from the front of the parking space.	1	2	I	\$350

No accessible route exists to the baseball field and player benches, bleachers, soccer fields, and picnic table. An abrupt change in level surface of approximately 6" occurs at the entrance to the player's seating area at the ball field due to pressure treated border. See Photos Brookmeadow 2 and 3.	402 303 403.3 403.4	19.0 20.0 22.4	Construct an accessible route to the ball fields and player benches, bleachers, soccer fields, and picnic table compliant with width and slope (2% cross, 5% running) requirements. As part of the accessible route to the player's seating, modify (cut segment of board) to eliminate the level surface change.	1	3	L	Up to \$25,000
The existing picnic table does not provide the required accessible knee and toe clearance. See Photo Brookmeadow 4.	226.1 902	19.5.2 19.6.2	At least 5% or at least one table must be accessible. Replace the existing table or provide an additional one which has a table surface of between 28" to 34" a.f.f. to the top surface with at least 27" knee clearance, 30" clear width, and 19" depth.	2	1	N	\$750
The bleachers lack level surface areas for wheelchairs.	221.2 802.1	14 19	Create an approach and wheelchair companion area at the bleachers. Spaces should be 36" wide x 60" deep per wheelchair. If paired, spaces can be reduced to 33" in width. If a front/rear approach, the depth can be reduced to 48" as opposed to 60" for a side approach.	2	3	N	\$200
The "accessible" toilet is not ADA compliant as the soap dispenser is more than 42" high (521 CMR), the toilet paper is above the reach range, the rim of the toilet seat is greater than 18" a.f.f., there is insufficient near and far wall clearance, insufficient clearance at the front of the toilet, and a door closing speed that is only 2 seconds. The door closing mechanism is not operable with a closed fist due to the location of the interior pull device. See Photos Brookmeadow 5 and 6.	308.2 308.3 604.7 309.4 604.4 604.2 404.2.8	30.12 30.7.6 30.8.5 30.7.2 30.7.2 26.9 26.11	Replace the existing "accessible" toilet with an "ADA Compliant" toilet such that soap/towel dispensers are no more than 42" a.f.f.; the toilet paper dispenser s/b a minimum of 24" a.f.f. and s/b 7" min. to 9" max. in front of the water closet measured to the centerline of the dispenser; the height of the water closet s/b 17" to 19" a.f.f. to the top of the seat; the water closet s/b 18" from the nearest sidewall, at least 42" from the farthest sidewall, and 42" from the front of the water closet to the nearest wall or fixture; and a door closing speed that is at least 6 seconds. The door closing mechanism should be operable with a closed fist and does not require pinching or twisting of the wrist.	3	2	I	TBD

Estimated Total Cost: Up to \$26,300

### **Brookmeadow Assessment Photos**



Photo Brookmeadow 1



Photo Brookmeadow 2



Photo Brookmeadow 3



Photo Brookmeadow 4



Photo Brookmeadow 5



Photo Brookmeadow 6

## **RIVERVIEW PARK**



**Description of Facility:** Smaller recreation area including soccer fields with 4 player benches, a playground area with a bench and picnic table, and a non-compliant “accessible” portable toilet.

**General Description or Obstacle Which Limits Mobility or Access:** The facility lacks accessible parking. There is no accessible route to and within the recreation facility nor to the playground area and playground bench and picnic table. The picnic table lacks the required knee and toe clearance. An “accessible” portable toilet is not on an accessible route and is not ADA compliant. The playground has minimal accessible play components. The entry gate into the playground area does not have a smooth surface at the base. Non-compliant wood chips are the primary surface throughout the playground area. The portable toilet lacks sufficient interior space for a 360 degree turn, does not meet water closet setback and clearance requirements, and does not meet dispenser height requirements.



## Riverview Accessibility Assessment

General Description of Obstacle	2010 ADAAG	MAAB 521 CMR	Type of Action to be Taken	P	F	TF	Cost Estimate
There are no designated accessible parking spaces. The parking lot does not have a firm, level, and slip resistant surface.	502 703.7	23	Create a minimum of one van accessible space and one passenger vehicle space as follows: stripe and designate a van accessible parking space and a passenger accessible parking space with van and passenger accessible signage. The van space s/b at a width of 8' with a 8' access aisle and the passenger space s/b at width of 8' with a 5' access aisle; signage must be set such that the signage height should be a minimum of 60" high at the bottom (2010 ADAAG Standards) and a maximum of 96" at the top (MAAB 521 CMR) and located in front of the space; slopes should not exceed 2% in any direction.	1	3	N	Up to \$5,000
No accessible route exists to the soccer fields, player benches, "accessible" portable toilet, and playground. A running slope of roughly 19% exists at the entrance to the playground. See <a href="#">Photos Riverview 1 and 2</a> .	402 303 403.3 403.4	19.0 20.0 22.4	Construct an accessible route to the soccer fields, player benches, "accessible" portable toilet, and playground compliant with width and slope (2% cross, 5% running) requirements.	1	3	L	Up to \$45,000
The existing picnic table does not provide the required accessible knee and toe clearance. See <a href="#">Photo Riverview 3</a> .	226.1 902	19.5.2 19.6.2	At least 5% or at least one table must be accessible. Replace the existing table or provide an additional one which has a table surface of between 28" to 34" a.f.f. to the top surface with at least 27" knee clearance, 30" clear width, and 19" depth.	2	1	N	\$750
There is no level surface area for wheelchairs at the playground bench.	221.2 802.1	14 19	Create an approach and wheelchair companion area at the bench. The space should be 36" wide x 60" deep per wheelchair. If a front/rear approach, the depth can be reduced to 48" as opposed to 60" for a side approach.	2	3	N	Included in above
No accessible route exists within the playground area to the two play structures, bench, and picnic table. No accessible route exists around the perimeter of the play area. There are no accessible play components. Non-compliant wood mulch is the sole surface treatment for the play area. See <a href="#">Photo Riverview 4</a> .	402 1008.2 226.1	19.7 20.0 14 19	Construct an accessible route compliant with width and slope (2% cross, 5% running) requirements around the perimeter of the play area (4' wide minimum) and to the play structure elements (stairs, slide base, etc). A minimum of 32" clear width must exist at the gated entrance. The accessible route must be stable, firm, and slip resistant. Construction options include compacted stone dust, asphalt, concrete, poured in place products, etc. Costs will vary depending on product used. Accessible playscape and ground components should be added. The bench and picnic table s/b located on an accessible route. The bench should have a wheelchair companion area (see above). Play area ground surfaces must comply with ASTM F 1951 and ASTM F 1292.	1	3	L	Up to \$30,000
The gate to the playground does not comply with the 2010 ADA Standards for a smooth surface within 10 inches of the ground on the push side for the full width of the gate. See <a href="#">Photo Riverview 5</a> .	404.2	NA	Remove gates or install smooth plating at base of gate.	1	2	N	Up to \$100

The “accessible” toilet is not ADA compliant as the both the soap and toilet paper dispensers are more than 10” above reach range, the rim of the toilet seat is greater than 18” a.f.f., there is insufficient near and far wall clearance, insufficient clearance at the front of the toilet, and a door closing speed that js only 2 seconds. See <a href="#">Photo Riverview 6</a> .	308.2 308.3 604.7 309.4 604.4 604.2	30.12 30.7.6 30.8.5 30.7.2 30.7.2 26.9	Replace the existing “accessible” toilet with an “ADA Compliant” toilet such that soap/towel dispensers are no more than 42” a.f.f.; the toilet paper dispenser s/b a minimum of 24” a.f.f. and s/b 7” min. to 9” max. in front of the water closet measured to the centerline of the dispenser; the height of the water closet s/b 17” to 19” a.f.f. to the top of the seat; the water closet s/b 18” from the nearest sidewall, at least 42” from the farthest sidewall, and 42” from the front of the water closet to the nearest wall or fixture; and a door closing speed that is at least 6 seconds.	3	2	I	TBD
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Estimated Total Cost: Up to \$80,850

### Riverview Assessment Photos



Photo Riverview 1



Photo Riverview 2



Photo Riverview 3



Photo Riverview 4



Photo Riverview 5



Photo Riverview 6

## **FISHER PARK/FERRY STREET PARK**



**Description of Facility:** Larger park area including 3 baseball fields including player seating, a batting/pitching cage, a playground/playscape, a basketball court, tennis courts, bleachers, picnic tables, benches, bathrooms, a concession stand, and a 2<sup>nd</sup> level broadcast/viewing booth.

**General Description or Obstacle Which Limits Mobility or Access:** There is no designated accessible parking on the Fisher/Ferry Street Park Complex. Both the men's and women's bathrooms are wholly non-compliant. The counter at the concession stand is 2" too high. There are no "accessible routes" to the bathrooms, concessions area, and broadcast booth at McNamara Field. Railings are provided on only one side of the stairs to the broadcast booth. There is no accessible route to and within the Fisher/Ferry Street Park Complex to various elements including the baseball fields, player benches and dugouts, bleacher seating, public benches, picnic tables, basketball court, tennis court, batting/pitching cage and playground. The playground lacks accessible play components. There is no accessible route around or within the playground area including to the play components and bench. Non-compliant wood chips are the primary surface throughout the playground area. None of the picnic tables at the concession area provide compliant clear width or knee/toe clearance. Excessive abrupt changes in level surface exist at all dug-out entry way, the batting/pitching cage entry way and all McNamara Field entryways. Non-compliant protruding objects are found at the concession area. Entry gates at McNamara Field do not have a smooth surface at the base. Bleachers lack accessible wheelchair viewing.



## Fisher Park/Ferry Street Park Accessibility Assessment

<u>General Description of Obstacle</u>	<u>2010 ADAAG</u>	<u>MAAB 521 CMR</u>	<u>Type of Action to be Taken</u>	<u>P</u>	<u>F</u>	<u>TF</u>	<u>Cost Estimate</u>
There are no designated accessible parking spaces. The parking lot does not have a firm, level, and slip resistant surface.	502 703.7	23	Create a minimum of one van accessible space and one passenger vehicle space as follows: stripe and designate a van accessible parking space and a passenger accessible parking space with van and passenger accessible signage. The van space s/b at a width of 8' with a 8' access aisle and the passenger space s/b at width of 8' with a 5' access aisle; signage must be set such that the signage height should be a minimum of 60" high at the bottom (2010 ADAAG Standards) and a maximum of 96" at the top (MAAB 521 CMR) and located in front of the space; slopes should not exceed 2% in any direction.	1	3	N	Up to \$500
No accessible route exists to the baseball fields (3), to and around the playground, basketball court, tennis court, bleachers, playground/concession area picnic tables, playground benches, bathrooms, dugouts, player's benches, and batting/pitching cages. An abrupt change in level surface exists of up to 3 inches exists at the dugouts, McNamara Field access, and batting/pitching cage. The clear width to playground is 5" too narrow. See Photos Fisher/Ferry 1, 2, 3, and 4.	402 303 403.3 403.4 802.1 221.2 403.4 303 404.2	19.0 20.0 22.4 14 19 26.5	Construct an accessible route to the baseball fields (3), to and around the playground, basketball court, tennis court, bleachers, playground/concession area picnic tables, bathrooms, dugouts, player's benches, and batting/pitching cages compliant with width and slope (2% cross, 5% running) requirements and abrupt change in level surface requirements (no greater than ¼" unbeveled). The fencing/gate at the playground area access needs to be modified to create a minimum of 32" clear width. Create an approach and wheelchair companion area at the bleachers and at the playground benches. Spaces should be 36" wide x 60" deep per wheelchair. If paired, spaces can be reduced to 33" in width. If a front/rear approach, the depth can be reduced to 48" as opposed to 60" for a side approach. <i>Note: Assume use of a segment of the parking area (roughly 250 l.f. x 4' wide) segregated by moveable berm as part of the accessible route of travel.</i>	1	3	L	Up to \$31,500+
No accessible route exists within the playground area to play components. There are no accessible play components. Non-compliant wood mulch is the sole surface treatment for the play area. See Photo Fisher/Ferry 5.	402 1008.2	19.7 20.0 14 19	Construct an accessible route compliant with width and slope (2% cross, 5% running) requirements to the play structure elements. The accessible route must be stable, firm, and slip resistant. Construction options include compacted stone dust, asphalt, concrete, poured in place products, etc. Costs will vary depending on product used. Accessible playscape and ground components should be added. Play area ground surfaces must comply with ASTM F 1951 and ASTM F 1292.	1	3	L	Up to \$28,000
The counter at the <u>McNamara Field</u> concession window is 36" a.f.f. which is 2" too high.	904.5	17.6.2	Create a 36" wide counter no higher than 34" a.f.f. below the existing counter.	1	2	N	Up to \$500
An electrical meter and a pressure breaker at the <u>McNamara Field</u> concession stand are protruding objects as they extend more than 4" into the accessible route of travel between a height of 27" and 80" a.f.f. See Photos Fisher/Ferry 6 and 7.	307.2	20.6.1	Place a fixed object under the meter and breaker.	4	1	I	\$0
There is an abrupt change in level surface of roughly 5" at the entrance to the concession stand work area at <u>McNamara Field</u> . See Photo Fisher/Ferry 7.	404.2	26.10	Modify entrance such that there is no greater than a ¼" unbeveled abrupt change in level surface at the entrance. This may require an earthen, concrete, or wooden "ramped" approach with a level landing at the entrance.	4	3	L	Up to \$1,500

The <u>McNamara Field</u> concession stand entry lacks accessible tactile designation signage on the latch side of the door. The door hardware is non-compliant knob-style. <a href="#">See Photo Fisher/Ferry 7.</a>	703 404.2	41.1 26.11	Install accessible compliant designation signage on the latch side of the door with appropriate finish and contrast and character height and proportions, raised and brailled characters should also be included. Tactile characters on the sign s/b 48" min. a.f.f.. from baseline of lowest character and 60" max. a.f.f. to baseline of highest character. Characters must meet the ADA Standards for character height, finish and contrast, accompanied by Grade 2 Braille (703 ADA Standards). Install lever hardware on the door.	4	2	I	\$35
The stairs to the <u>McNamara Field</u> broadcast booth has railings on only one side of the stairs. <a href="#">See Photo Fisher/Ferry 8.</a>	505.4 505.2 505.10	27.4	An additional railing must be provided so that it is between 34" to 38" in height (505.4, 27.4), located on the stair side with no railing (505.2, 27.4), and have a 12" extension parallel to the ground at the top and an extension sloped the distance of one tread then 12" parallel to the ground (505.10, 27.4).	4	3	N	\$350 to \$1,350
There is no vertical access/accessible route to the roughly 340 sq. ft. <u>McNamara Field</u> broadcast booth.	206 206.2.7	14	Although the 2010 ADA Standards do allow for an "exception" requiring an accessible route to press boxes/broadcast booths that are free-standing, above grade no more than 12 feet, and less than 500 sq. ft. in size; 521 CMR does not. The town may consider the following options:  <i>Option 1: Discontinue use of the broadcast booth.</i>  <i>Option 2: Seek a variance from the MAAB to not require the provision of an access route to the broadcast booth.</i>  <i>Option 3: Seek a variance from the MAAB to allow for a vertical wheelchair lift or LULA to access the broadcast booth (technically a full elevator is required).</i>	4	4	L	\$0 to \$75,000
The <u>McNamara Field</u> gates (dugouts, field access, batting/pitching cage, tennis courts) do not comply with the 2010 ADA Standards for a smooth surface within 10 inches of the ground on the push side for the full width of the gate. <a href="#">See Photo Fisher/Ferry 9.</a>	404.2	NA	Remove gates or install smooth plating at base of gate.	1	2	N	Up to \$1,800
<u>Men's and Women's Bathrooms</u> The entry doors lack accessible tactile designation signage on the latch side of the door.	703	41.1	Install accessible compliant designation signage on the latch side of the doors with appropriate finish and contrast and character height and proportions, raised and brailled characters should also be included. Tactile characters on the sign s/b 48" min. a.f.f.. from baseline of lowest character and 60" max. a.f.f. to baseline of highest character. Characters must meet the ADA Standards for character height, finish and contrast, accompanied by Grade 2 Braille (703 ADA Standards). Install lever hardware on the interior door.	3	2	I	\$70
There is an abrupt change in level surface of roughly 5" – 5½" at the entrances to the bathrooms. <a href="#">See Photo Fisher/Ferry 10.</a>	404.2	26.10	Modify entrance such that there is no greater than a ¼" unbeveled abrupt change in level surface at the bathroom entrances. This may require an earthen, concrete, or wooden "ramped" approach with a level landing at the entrance.	3	3	I	Up to \$2,800+
The sink piping is not wrapped, guarded, or insulated. <a href="#">See Photo Fisher/Ferry 11.</a>	606.5	30.9.5	Wrap or insulate piping.	3	2	I	\$100

The soap dispensers (44+” a.f.f. over a 22” counter obstruction) are outside the zone of reach under 521 CMR. The towel dispensers are 16” to 18” too high.	308.2 308.3	30.12 6.5 6.6	Lower dispensers to a max. of 42” a.f.f. (521 CMR) and within the zone of reach.	3	2	I	\$0
The women’s room mirror is 12¾” too high. <i>Note: Men’s bathroom does not have a mirror.</i>	603.3	30.11	Remove mirror or lower such that the bottom of the mirror (reflecting surface) is no greater than 40” a.f.f.	3	2	I	\$0
Light switches in both bathrooms exceed the maximum reach range under the 2010 ADA Standards by 22”. <i>Note: Neither sensor device worked on the light switches and had to be operated manually.</i>	308.2 308.3	6.5 6.6	Lower the light switches to no more than 48” a.f.f.	3	3	I	\$500
The toilet paper dispensers are 54” a.f.f. and 0” o.c. from the front of the water closet.	604.7	30.7.6	Relocate toilet paper dispensers such that they are 7” minimum and 9” maximum in front of the water closet measured to the centerline of the dispenser. The dispensers s/b a minimum of 24” a.f.f. and not mounted above the grab bars.	3	2	I	\$0
The stall doors are not self-closing, lack pull devices on either side of the stall doors, and have non-compliant locking mechanisms that also exceed maximum reach range. <i>See Photo Fisher/Ferry 12.</i>	604.8 404.2	30.6 26.11	Modify stall doors to include self-closing hinges, install pull devices on both sides of the doors, and install locking mechanisms that can be operated with a closed fist. The pull devices and locking mechanisms should be between 34” and 48” a.f.f.	3	3	I	Up to \$400
The flush control of the women’s water closet is not located on the approach side.	604.6	30.7	Relocate flush control so that it is on the wide or approach side or replace with an automatic flush control.	3	3	I	Up to \$750
The men’s water closet is 1½” too far from the near wall. Both the men’s and women’s water closets are 1½” to 2½” too close to the far wall.	604.2	30.7	Relocate existing water closets to comply with 18” to the water closet centerline from the nearest sidewall and 42” minimum to the center line of the water closet from the farthest wall (521 CMR). The side stall wall may need to be moved to achieve minimum required clearance.	3	3	I	Up to \$2,500
There are no grab bars in either the men’s or women’s water closet stalls.	609	30.8	Install side and rear grab bars at a height of 33” to 36” to the top of the gripping surface. Bars s/b 1¼” to 1½” in diameter and circular in x-section. The side grab bars s/b no more 12” from the interior corner and the rear grab bars no more than 6” from the interior corner.	3	2	I	\$600

**Estimated Total Cost:** Up to \$147,905

## Fisher Park/Ferry Street Assessment Photos



Photo Fisher/Ferry Park 1



Photo Fisher/Ferry Park 2



Photo Fisher/Ferry Park 3



Photo Fisher/Ferry n Park 4



Photo Fisher/Ferry Park 5

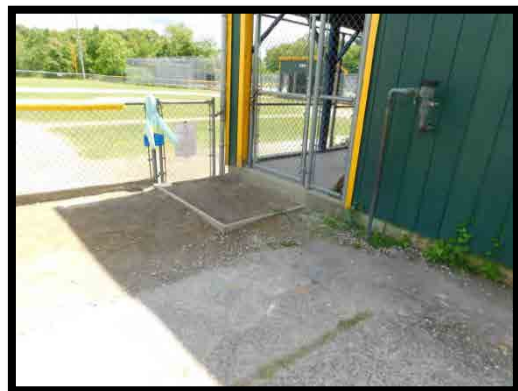


Photo Fisher/Ferry Park 6



Photo Fisher/Ferry Park 7



Photo Fisher/Ferry Park 8



Photo Fisher/Ferry Park 9



Photo Fisher/Ferry Park 10



Photo Fisher/Ferry Park 11



Photo Fisher/Ferry Park 12



## **SILVER LAKE BEACH**



**Description of Facility:** Water-based recreational area including a gate attendant booth, staff and storage building, pavilion, concession stand, outside showers, bathrooms, picnic tables, grilling stations, dock/fishing pier, and a beach.

**General Description or Obstacle Which Limits Mobility or Access:** There is no designated accessible parking at Silver Lake Beach. The attendant booth and staff building are not accessible. Although there is an “accessible mat” to the edge of the sand of the beach, it does not allow further access. The ground surface does not appear to have been prepped prior to laying down the mat. Running and cross slopes exceed the maximum allowed and the surface is uneven. No accessible route exists to any of the elements and activities at the beach including the shower/concession/bathroom facility. The shower pulls exceed the maximum allowable reach range and are not operable with a closed fist. None of the picnic tables provide adequate knee and toe clearance for accessibility. The concession stand counter is too high as are 2 coat hooks near the stand. The interior of the concession area used by employees lacks adequate clearances and exceeds numerous height restrictions. This area may need to be modified in the future if required as an employee reasonable accommodation. The dock/fishing pier lacks curbing, handrails, detectable warning strips, and transition plates between floats. One of the metal access plates has a cross slope of more than 3.5%. Both the men’s and women’s bathrooms have numerous elements of non-compliance.



## Silver Lake Beach Accessibility Assessment

<u>General Description of Obstacle</u>	<u>2010 ADAAG</u>	<u>MAAB 521 CMR</u>	<u>Type of Action to be Taken</u>	<u>P</u>	<u>F</u>	<u>TF</u>	<u>Cost Estimate</u>
There is no compliant accessible passenger vehicle or van parking at the beach as the designated spaces are not level and are not on a stable/firm surface. No striping exists and existing signage is too low. See Photo Silver Lake 1.	502 703.7	23	Create a van accessible space and a passenger vehicle as follows: stripe and designate a van accessible parking space with van accessible signage at a width of either 11' with a 5' access aisle or 8' with and 8' access aisle (2010 ADA Standards) and create a passenger vehicle space that is 8' wide with a 5' wide access aisle. Signage must be set such that the signage height should be a minimum of 60" high at the bottom (2010 ADAAG Standards) and a maximum of 96" at the top (MAAB 521 CMR) and located in front of the space; slopes should not exceed 2% in any direction. The surface of the parking spaces and access aisles must be stable, firm, and slip resistant and can be compacted stone dust (if properly installed and maintained), asphalt, or concrete.	1	3	N	Up to \$15,000
The gate attendant booth is not on an accessible route due to the 9" vertical rise to enter the building. The building door has knob-style hardware. See Photo Silver Lake 2.	403 303 404.2	22 26.11	Construct a ramped approach at appropriate running and cross slopes and railings as required. Install lever-style hardware.	4	3	N	Up to \$5,000
The staff building is not on an accessible route due to the 2" vertical rise to enter the building. The building door has knob-style hardware.	403 303 404.2	22 26.11	Construct an earthen "ramped" approach at appropriate running and cross slopes as required. Install lever-style hardware.	4	3	N	Up to \$750
There is no accessible route of travel to the beach area, showers, concession, bathrooms, picnic tables pavilion, grilling area, dock/pier, and water. See Photos Silver Lake 3, 4, and 5.	403	19 20 22	There needs to be an accessible route to all programs and services. Currently the route of travel leading to the beach and related amenities is non-compliant due to one or more of the following conditions – abrupt change in level surface, excessive running slope, excessive cross slope, and not firm, stable, and slip resistant. The accessible route does not have to be paved but it needs to be maintained. In this area, it could consist of different types of surfaces connecting to each other (buildings, activity areas, beach). For example, a permanent asphalt walkway could be created from the parking lot to the beach area, showers, concession and bathrooms. An alternative surface such as accessible roll-out matting could be considered to access the beach and its various elements including pavilion, picnic tables, grilling area, dock/pier, and water.	1	3	N	Up to \$15,000
One of the approach metal plates to the dock/pier has a 3.7% cross slope. There are excessive changes in level surface of up to ¾" between dock segments and an up to 4" gap at the initial segment hinge. There are no curbs, railings, or detectable warning strips. See Photos Silver Lake 6 and 7.	1003 1005	19	In addition to adjusting the metal plate to adhere to the maximum 2.0% cross slope requirement, the structure itself will require transition plates between segments to eliminate the existing gaps and changes in level surface as well as 4" curbs, handrails, or detectable warnings.	2	3	N	Up to \$10,000
The counter at the concession window is 7" too high at 41" a.f.f.	904.5	17.6.2	Create a 36" wide counter no higher than 34" a.f.f. below the existing counter or lower the existing counter.	1	2	N	Up to \$500
Existing hooks on the side panel at the concession stand are 13" too high and not within reach range.	308.2 308.3	6.5 6.6	Lower at least one hook to no more than 48" a.f.f.	4	2	I	\$0

Five picnic tables are located under or near the pavilion and 7 others, including one accessible picnic table, are congregated in a separate location. None of the tables are on an accessible route.	226.1 902	19.5.2 19.6.2	At least 5% or at least one table must be accessible in each separate area where provided. Provide an additional picnic table at the pavilion which has a table surface of between 28" to 34" a.f.f. to the top surface with at least 27" knee clearance, 30" clear width, and 19" depth and on an accessible route. Picnic tables must be located on an accessible route of travel and the wheelchair area must be firm, stable, level, and slip resistant.	2	1	N	\$750
There is an abrupt change in level surface of roughly 1" at the entrance to the concession stand work area	404.2	26.10	Modify entrance such that there is no greater than a ¼" unbeveled abrupt change in level surface at the entrance.	4	3	N	Up to \$350
The concession stand entry lacks accessible tactile designation signage on the latch side of the door.	703	41.1	Install accessible compliant designation signage on the latch side of the door with appropriate finish and contrast and character height and proportions, raised and brailled characters should also be included. Tactile characters on the sign s/b 48" min. a.f.f. from baseline of lowest character and 60" max. a.f.f. to baseline of highest character. Characters must meet the ADA Standards for character height, finish and contrast, accompanied by Grade 2 Braille (703 ADA Standards).	4	2	I	\$35
There are interior concession area issues of non-compliance including counter heights, sink heights, reach ranges, clear widths and maneuverability.	904.5 304 308.2 308.3 606	17.6.2 32 6.5 6.6	As this is a non-public area for employees only, address as may be required through a reasonable accommodation.	4	3	L	TBD
The shower pulls are not within reach range at 55" to 56" a.f.f. and cannot be used with a closed fist due to the size of the pull ring. <a href="#">See Photo Silver Lake 8.</a>	308.2 308.3 309	6.5 6.6 39	Lower the bottom of pull device to no more than 48" a.f.f. and replace the existing ring with a larger one that can be operated with a closed fist.	3	2	I	\$100
<u>Men's and Women's Bathrooms</u> The entry doors lack tactile accessible designation signage on the latch side of the door.	703	41.1	Install accessible compliant designation on the latch side of the doors with appropriate finish and contrast and character height and proportions, raised and brailled characters should also be included. Tactile characters on the sign s/b 48" min. a.f.f. from baseline of lowest character and 60" max. a.f.f. to baseline of highest character. Characters must meet the ADA Standards for character height, finish and contrast, accompanied by Grade 2 Braille (703 ADA Standards).	3	2	I	\$70
The sink piping is not wrapped, guarded, or insulated. <a href="#">See Photo Silver Lake 9.</a>	606.5	30.9.5	Wrap or insulate piping.	3	2	I	\$100
The men's towel dispenser is 2" too high. Both the men's and women's dispensers protrude more than 7" into the accessible route of travel.	308.2 308.3 307.2	30.12 6.5 6.6 20.6.1	Lower the men's dispenser to a max. of 42" a.f.f. (521 CMR) and within the zone of reach. Relocate both dispensers so they do not extend more than 4" into the accessible route of travel between a height of 27" and 80" a.f.f.	3	2	I	\$0
The wall mounted mirrors (54" to 56" a.f.f.) are 14" to 16" too high. <a href="#">See Photo Silver Lake 9.</a>	603.3	30.11	Lower mirrors such that the bottom of the mirror (reflecting surface) is no greater than 40" a.f.f.	3	2	I	\$0

The men's urinal has only 28½" clear width at the urinal.	605.3 305.3	30.10	A minimum of 30" x 48" clear floor space is required for a forward approach. Move free-standing wall partition a minimum of 1½" to the left of the urinal.	3	2	I	\$0
The toilet paper dispensers in both bathrooms are located over the grab bars. <b>See Photo Silver Lake 10.</b>	604.7	30.7.6	Relocate both toilet paper dispensers such that they are 7" minimum and 9" maximum in front of the water closets measured to the centerline of the dispenser. The dispensers s/b a minimum of 24" a.f.f. and not mounted above the grab bars.	3	2	I	\$0
Both the men's and women's bathroom rear grab bars are mounted 6" too far from the inside corner. <b>See Photo Silver Lake 10.</b>	604.5 609.4	30.8.1	Move rear grab bars so that they are no more than 6" from the interior corner.	3	2	I	\$0
The men's water closet stall door is not self-closing.	604.8.2	30.6.1	Modify or replace hinge so that it is self-closing.	3	2	I	Up to \$150
The men's and women's stall door coat hooks are 17" too high.	308.2 308.3	30.6.1	Lower coat hook to no more than 48" a.f.f.	3	2	I	\$0
The women's water closet flush control is not on the open or wide side. <b>See Photo Silver Lake 10.</b>	604.6	30.7.5	Relocate flush control so that it is on the wide or approach side or replace with an automatic flush control. Wrap and/or insulate piping.	3	3	I	Up to \$750
The men's water closet is 1¼" too close to the near wall; the women's water closet is 1½" too far from the near wall.	604.2	30.7.2	Modify the existing water closets such that the centerline of the water closets are 18" from the nearest sidewall and at least 42" from the farthest sidewall or object.	3	3	N	Up to \$1,500

**Estimated Total Cost:** Up to \$50,055

## Silver Lake Beach Assessment Photos



Photo Silver Lake 1



Photo Silver Lake 2



Photo Silver Lake 3



Photo Silver Lake 4



Photo Silver Lake 5



Photo Silver Lake 6

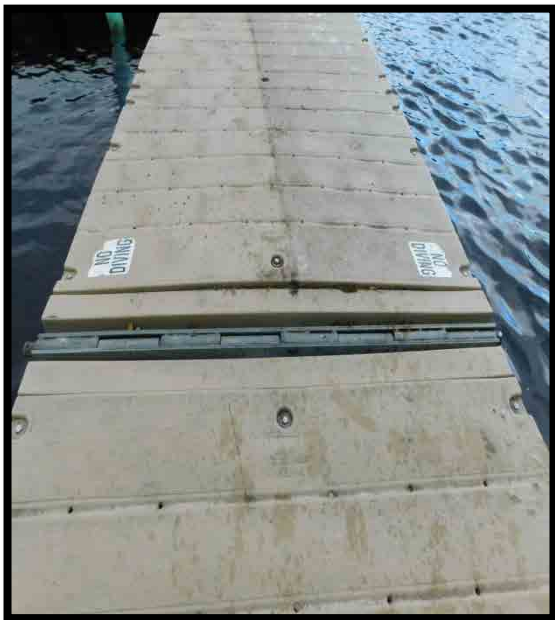


Photo Silver Lake 7

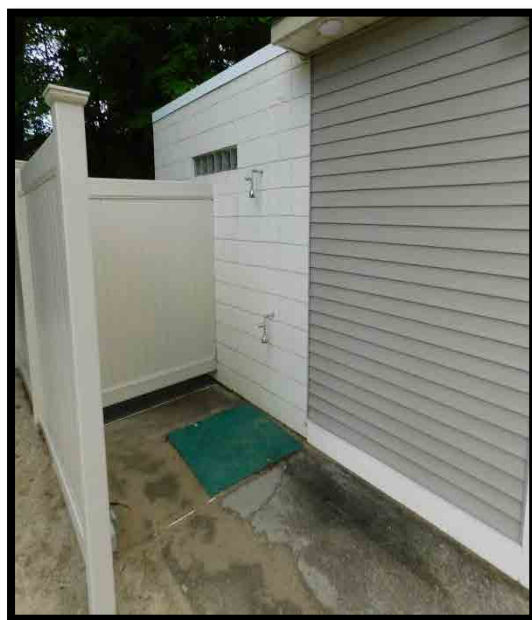


Photo Silver Lake 8



Photo Silver Lake 9



Photo Silver Lake 10



## **TOWN COMMON**

**Function and Description of Facility and Programs:** The historic town common is not only a town landmark but also serves as a passive recreational area, green space, and location for civic events and activities ranging from concerts, farmer's markets, and other local events. The common contains a gazebo, 4 benches, lawn area, and a paved walkway through its center. In addition, there is regular parking and designated "accessible" parking at the common.



**Responsible Party:** Board of Selectmen

**General Description or Obstacle Which Limits Mobility or Access:** The single parking space has excessive cross-slopes, an uneven surface, an abrupt change in level surface due to a remaining light pole base, a non-compliant access aisle, and is not van accessible. The historical/interpretive sign at the edge of the common is not on an accessible route. None of the four existing benches in the common are on an accessible route nor does any bench have an adjacent wheelchair designated space. The gazebo is not accessible to those with mobility limiting disabilities. There is no accessible route of travel to the gazebo and the performance/stage level of the gazebo is 14" above finish ground and can only be accessed by stairs with two steps. There are no railings for the stairs. None of the benches on the common are on an accessible route nor does any bench have an adjacent wheelchair designated space.



## Town Common Accessibility Assessment

<u>General Description of Obstacle</u>	<u>2010 ADAAG</u>	<u>MAAB 521 CMR</u>	<u>Type of Action to be Taken</u>	<u>P</u>	<u>F</u>	<u>TF</u>	<u>Cost Estimate</u>
The designated accessible parking space at the common has a cross slope that approached 6% (2% maximum allowed), has a non-compliant access aisle due to its shape and narrow width, has an uneven surface, and an abrupt change in level surface of greater than ¼" due to the remnants of a metal pole within the access aisle. The space is not designated as van accessible. <a href="#">See Photos Town Common 1 and 2.</a>	502 703.7	23	Reconfigure and reconstruct the existing parking and access aisle to create a minimum of one van accessible space as follows: excavate, regrade and reconstruct a minimum of one van accessible parking space with a designated access aisle. The van space s/b at a width of 8' with an 8' access aisle. Van accessible signage must be set such that the signage height should be a minimum of 60" high at the bottom and a maximum of 96" at the top and located no more than 10' in front of the space. Running and cross slopes should not exceed 2% in any direction and there should be no abrupt changes in level surface of greater than ¼".	1	3	N	Up to \$5,000
The designated accessible on-street parking space in front of the library has running and cross slopes that vary between 4% to 6% (2% maximum allowed) and is not adjacent to an accessible route.	502 703.7	23	As feasible, reconstruct the existing parking to comply with 2.0% maximum running and cross slope requirements. Modify the approach to the sidewalk to meet minimum "curb cut" standards.	1	3	N	Up to \$5,000
An accessible route needs to be provided to both sides of the interpretive sign at the entrance to the common. <a href="#">See Photo Town Common 3.</a>	402 802.1	20.0 19.0	Construct an accessible route compliant with width (48" wide w/36" clear width) and slope (2% cross, 5% running) requirements to the interpretive sign. Construction options can include compacted stone dust, asphalt, concrete, or similar surfaces that meet the requirement of stable, firm, and slip resistant.	2	3	N	Up to \$1,000
There are 4 benches on the common, none of which are on an accessible route nor have a wheelchair area.	402 403 221.2 802.1	20 22 14 19	Relocate one bench or purchase a new bench so it is adjacent to the walkway through the common. Create a wheelchair area next to the bench. Construction options include compacted stone dust, asphalt or similar surfaces that meet the requirement of stable, firm, and slip resistant. The wheelchair space should be 36" wide x 60" deep per wheelchair. If a front/rear approach, the depth can be reduced to 48" as opposed to 60" for a side approach.	2	3	N	\$100 to \$1,200
There is no accessible route (vertical access) to the gazebo. The existing stairs lack railings. <a href="#">See Photo Town Common 4.</a>	206.2	20 14	A ramp with compliant slopes (no greater than 2.0% c.s and 8.3% r.s.); railings (paired 34" to 38" a.f.f. and 18" to 20" a.f.f. to the top of the railings); top and bottom 12" railing extensions; minimum 48" clear width between railings (521 CMR); a level landing; and edge protection must be provided.	2	3	N	Up to \$20,000
	505.4 505.7 505.10	27.4.2 27.4.5 27.4.3	If the stairs are to remain, they must be modified with compliant handrails on both sides of the stairs that are oval or round in cross-section and no greater than 2" in outside diameter; 34" to 38" a.f.f. and with 12" extensions at the top and extensions at the bottom of one tread distance (sloped) then 12" parallel to the ground.				

Total up to \$32,200

## **Town Common Accessibility Assessment Photos**



Photo Town Common 1



Photo Town Common 2



Photo Town Common 3



Photo Town Common 4

## **TOWN COMMON AREA AND NORTH MAIN STREET SIDEWALKS AND CURB RAMPS**

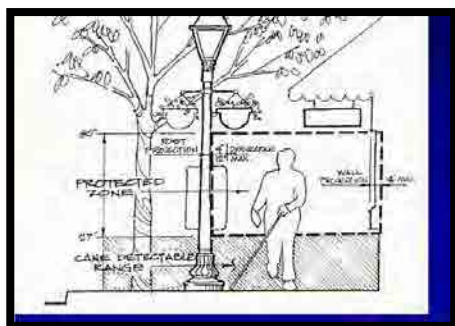
**Description of Assessment Area:** The assessment of public sidewalks, curb ramps, and crosswalks within the town was limited to the immediate area along the Town Common and a portion of North Main Street from roughly Mill Street to the Route 140 North/Route 30 East intersection. However, the standards as described below and related requirements applies to all sidewalks and curb ramps in the Town of Grafton.

**Regulatory Compliance:** Sidewalks and curb ramps must adhere to the rules and regulations of the Massachusetts Architectural Access Board as provided in 521 CMR, and the requirements of the Americans with Disabilities Act as provided for in the regulations of the United States Access Board and as required by the United States Department of Transportation, Federal Highway Administration. These federal requirements are principally listed in the 2010 Americans with Disabilities Act Accessibility Guidelines (“ADAAG”) and the Public Right of Way Accessibility Guidelines (“PROWAG”). In addition, in March 2012, the Massachusetts Department of Transportation issued “*Notes on Walks and Wheelchair Ramps for Designers and Construction Engineers*” to be used as further guidance on this matter. These notes are a supplement to and not a replacement for the 521 CMR, PROWAG, and ADAAG Regulations.

**General Standards for Compliance:** In summary, the guidance and regulations under the 2010 ADAAG, PROWAG, 521 CMR, and MA DOT Notes on Sidewalks and Ramps is as follows:

### **Sidewalks**

- A minimum of a 4 feet wide sidewalk (excluding the curb) with a 3 feet minimum unobstructed width. If the sidewalk is not 5 feet wide, then a 5 feet by 5 feet level passing space should be provided every 200'. Citation: ADAAG S. 403.5; 521 CMR S. 22.2; PROWAG.
- If the slope of the natural topography exceeds 1:20 (5%), a ramp is not required for a sidewalk. Citation: ADAAG S. 403.3; 521 CMR S. 22.3; PROWAG.
- The finished cross slope of any walkway or sidewalk should not exceed 1:50 (2.0%). Citation: ADAAG S. 403.3; 521 CMR S. 22; PROWAG.
- Walkway and sidewalk surfaces shall be firm, stable, and slip resistant. Openings in the route of travel (grates, etc.) can be no more than ½” wide. The “long” opening should be perpendicular to the route of travel. There shall be no abrupt changes in level surface of more than ¼”, unless beveled up to ½”. Citation: ADAAG S. 403, 302; 521 CMR S. 22.4, 22.5, 22.7; PROWAG.
- Objects between 27” and 80” above the finish surface may not protrude more than 4” into the entire pedestrian circulation route. Citation: ADAAG S. 204; 521 CMR S. 20.6; PROWAG.
- All sidewalks/accessible routes of travel must be maintained and kept in a good quality condition including being kept free of snow and ice or other debris which would restrict access.

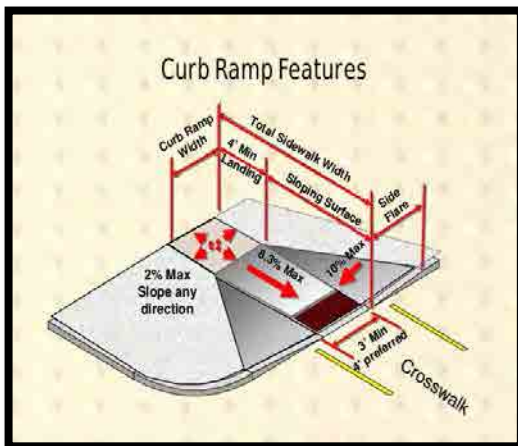


## Curb Ramps

- Whenever sidewalks, walkways, or curbs on streets and ways are constructed, reconstructed, or repaired, curb cuts are required. Citation: ADAAG S. 204; 521 CMR S. 20.6; PROWAG.
- Curb cuts shall occur whenever an accessible route crosses a curb. Citation: ADAAG S. 405, 406; 521 CMR S. 21; PROWAG.
- Curb cuts are required at each corner of an intersection and typically are perpendicular to the street. Citation: ADAAG S. 406; 521 CMR S. 21; PROWAG.
- Curb cut wheelchair ramps should be placed within the general pedestrian flow to the greatest degree possible, to provide pedestrians the safety to see and be seen before crossing the street. Citation: ADAAG S. 406; 521 CMR S. 21; PROWAG.
- Paired reciprocal curb cut wheelchair ramps are preferred, however, apex ramps serving two directions may be used when intersection geometry precludes the use of paired ramps. The crosswalk should lead directly to the adjoining curb cut wheel chair ramp and sidewalk and not terminate in the roadway, a parking lot, or other area that is not part of the defined pedestrian flow. Citation: ADAAG S. 406; 521 CMR S. 21; PROWAG.
- The maximum running slope of a curb ramp shall be 1:12 (8.3%). Citation: ADAAG S. 406; 521 CMR S. 21; PROWAG.
- The maximum cross slope of a curb ramp shall be 1:50 (2%). Citation: ADAAG S. 406; 521 CMR S. 21; PROWAG.
- The maximum slope of a flared side shall be 1:10 (10%). Citation: ADAAG S. 406; 521 CMR S. 21; PROWAG.
- The minimum width of a curb ramp shall be 36 inches under ADAAG and 521 CMR but 48 inches under PROWAG, exclusive of flared sides. Citation: ADAAG S. 406; 521 CMR S. 21; PROWAG.
- Transitions from curb cuts to walks, gutters, or streets shall be flush or free of changes in level greater than ¼" or between ¼" and ½" if beveled. Citation: ADAAG S. 303, 403; 521 CMR S. 21; PROWAG.
- Grading and drainage shall be designed to minimize pooling of water, accumulation of debris, accumulation of ice or flow of water across the base of the curb cut. Citation: 521 CMR S. 21; PROWAG.
- A level landing (no more than 2.0% in all directions) at the top of the curb ramp is required. The level landing or turning area should be 4 feet deep by the width of the ramp at the curb line (minimum 3 feet, 5 feet preferred). The preferred level landing dimension, as feasible, is 5 feet x 5 feet. Citation: ADAAG S. 406; 521 CMR S. 21; PROWAG.
- Diagonal or corner type curb ramps with returned curbs or other well-defined edges shall have the edges parallel to the direction of pedestrian flow. The bottom of diagonal curb ramps shall have a clear space 48 inches minimum outside active traffic lanes of the roadway. Diagonal curb ramps provided at marked crossings shall provide the 48 inches minimum clear space within the markings. Diagonal curb ramps with flared sides shall have a segment of curb 24 inches long minimum located on each side of the curb ramp and within the marked crossing. Citation: ADAAG S. 406; 521 CMR S. 21; PROWAG.



- Detectable warnings with truncated domes are required at all street crossings under PROWAG. Citation: PROWAG.
- Fixed objects shall not be placed in any part of a wheelchair ramp. Citation: ADAAG S. 406; 521 CMR S. 21; PROWAG.
- Catch basins should be located immediately updrift at the wheelchair ramp entrance. Citation: ADAAG S. 406; 521 CMR S. 21; PROWAG
- Accessible pedestrian signals should provide both visual and audible information. The push button face should be parallel to the sidewalk and mounted within reach range (15 inches to 48 inches above finish ground). The side reach should be within 10 inches and there should be no forward reach obstruction. The button must be operable with a closed fist with no more than 5 lbs. of pressure to operate. The push button location should be between 1½ feet and 6 feet from the edge of the curb, shoulder, or pavement and no more than 5 feet from the crosswalk. Citation: PROWAG; 521 CMR S. 21.



**Responsible Party:** Highway Department and Board of Selectmen

**General Description or Obstacle Which Limits Mobility or Access:**

Town Common Area Sidewalks

**Comment:**

Overall, the sidewalks within and around the Town Common are in fair to good condition with some exceptions. Sidewalk clear width requirements are met, however a number of street intersections involve non-compliant curb ramps and/or crosswalks (described below). The sidewalks in front of the library which have some abrupt changes in level surface of  $> \frac{1}{4}$ " and show evidence of deterioration and heaving, the other sidewalks meet minimum accessibility standards. The "walkway" to the monument at the South Street/Upton Street intersection is non-compliant due to the use of loose stone. Approximately 4 concrete pads (roughly 20') immediately adjacent to the Worcester Street curb ramp at the Town House has cross slopes that vary from 2.5% to 5.7%. At the time of the site visit, a library sign restricted sidewalk access on South Street. **See Photos Town Common Sidewalks 1, 2, and 3.**

**Recommendation:**

The sidewalks in front of the library should be reclaimed and resurfaced to meet stable and level surface standards. This treatment should also be applied to the route of travel to the monument to make it

accessible. The non-compliant concrete sections on Worcester Street should be removed and re-poured and set to comply with the maximum 2.0% running slope requirement.

**Estimated Cost:**

Depending on construction means (asphalt vs. concrete) and methods, costs could vary from \$10,000 to \$20,000.



Photo Town Common Sidewalk 1



Photo Town Common Sidewalk 2



Photo Town Common Sidewalk 3

**North Main Street Sidewalks**

**Comment:**

Overall, with the exception of the concrete sidewalks on the east side of North Main Street (Erickson's Hardware), the remaining asphalt and concrete sidewalks are in poor to very poor condition. The concrete sidewalks in the #31 to #41 North Main Street area are severely deteriorated with cracks, loss of concrete, heaving, and numerous abrupt changes in level surface of  $> \frac{1}{4}$ ". A number of the driveway cross slopes vary to as much as 16.6% (maximum 2.0% allowed). A manhole cover and related surface deterioration at #41 North Main Street creates further impediments to travel. Similarly, debris accumulation (sand, leaves, dirt) in sidewalk areas further restricts access. The asphalt sidewalk at Ray Street is similarly cracked, heaved, and has an unlevel surface. [See Photos North Main Street Sidewalks 1, 2, 3, 4, 5, and 6.](#)

**Recommendation:**

At a minimum, noncompliant sidewalks on the west side of North Main Street should be replaced. The transition area to driveways need to maintain a no more than 2.0% cross slope and as a result, may require temporary construction easements on private property to modify driveway slopes so vehicles can still utilize the driveways. Reconstruction should also be done in a manner to prevent further pooling of water and accumulation of debris within the accessible route of travel. The asphalt sidewalk at Ray Street (east side of North Main Street) should also be reclaimed and resurfaced.

**Estimated Cost:**

Depending on construction means (asphalt vs. concrete) and methods, costs could vary up to \$40,000.





Photo N. Main St. Sidewalk 1



Photo N. Main St. Sidewalk 2



Photo N. Main St. Sidewalk 3



Photo N. Main St. Sidewalk 4



Photo N. Main St. Sidewalk 5



Photo N. Main St. Sidewalk 6

### Town Common Area Curb Ramps

#### Comment:

The crosswalks and curb ramps at Worcester Street near the Town House, at the town Common designated accessible parking space, at Church Street at the end of the Common, and at South Street at the Baptist Church all have non-compliant elements. The *Worcester Street* curb ramp has a 14.0% running slope, lacks a level landing, and has only 32½" of top maneuverability as opposed to the required 48". The crosswalk from the *Church parking lot to the Common* lacks detectable warning strips and terminates in the parking lot itself. The crosswalk at the *end of the Common on Church Street* is heaving and not level on the Common side including a manhole cover in the middle of the crosswalk, lacks detectable warning strips, and lacks a curb cut on Church Street (4" granite curb). The crosswalk is not perpendicular to the street and changes direction in the middle of Church Street. The *South Street crosswalk at the Baptist Church* lacks a curb cut with a 4" granite curb on the church side with the crosswalk terminating in a parking lot on the opposite side. No detectable warning strips are present.

See Photos in Table A.

#### Recommendation:

Compliant curb ramps that meet the standards described above should be installed at all locations. The Worcester Street curb ramp near the Town House will need to be removed and reconstructed to meet slope and maneuverability requirements. Depending on the location of the public right-of-way, it may be necessary to "take" some of the landscaped area adjacent to the sidewalk. Those crosswalks that enter into parking lots or change direction in a street will need to be re-oriented to ensure compliance.

#### Estimated Cost:

Depending on construction means and methods, costs could vary up to \$15,000.

### North Main Street Area Curb Ramps

#### Comment:

Most of the cross walks along North Main Street, except for Ray Street and the Route 140/30 intersection area do not have curb cuts/ramps. None of the cross walks/curb ramps (if exist) have detectable warning strips. In some cases, the running slope (Overlook Street, Ray Street) exceeds the maximum running slope allowed (8.3%) and/or does not have a level surface due to deterioration of the sidewalk and abrupt changes in level surface of > ¼'. In some instances (Mill Street, Overlook Street, Perry Street), there is an abrupt change of level surface of 4"+ due to granite curbing. None of the Accessible Pedestrian Signals at the Route 140/30 Intersection are fully compliant as at the time of assessment, none worked, and none had audibles. The diagonal or corner type curb ramps curb ramps at the intersection do not fully adhere to the edge and clear space requirements. Some of the curb ramps had running slopes ranging up to 11.6% and some had limited maneuverability at the top landing.

#### Recommendation:








ADA compliant curb ramps and crosswalks need to be installed on both sides of North Main Street (Mill Street to Route 140/30 intersection) as all lack detectable warning strips and most have 4" granite curbing. The eight curb ramps at the Route 140/30 intersection need modification to adhere to level landing and maneuverability requirements. In addition, the accessible pedestrian signals need repair or replacement as some do not work properly and none provide audible signalization. Due to slope constraints, it is not feasible to construct a fully compliant curb ramp to access the opposite side of North Main Street from the southern side of Perry Street. Construction should be limited to provide access across Perry Street. The existing cross walk on North Main Street should be relocated to the

northern side of Perry Street which does not have slope issues and is lower. A variance may or may not be required to limit crossing to one side and to relocate the crosswalk.




**Estimated Cost:**

Depending on construction means and methods the curb ramps and crosswalk modifications could vary up to and the needs of the accessible pedestrian signals costs could vary up to \$25,000. The related costs to address the accessible pedestrian signals is undetermined. [See Photos in Table B.](#)

**Table A: Grafton Town Common Curb Ramps**

Compliance Item	Worcester St. @ Town House	Crosswalk @ Parking Space	Church St. @ End of Common	South St. @ Baptist Church	Photo
Curb cut present	Yes	Yes (Common side)	Yes (Common side). <b>No (Church St.)</b>	<b>No (either side)</b>	
Compliant apex ramp	NA	NA	NA	NA	
Crosswalks ends in street or parking lot	No	<b>Yes (church parking lot)</b>	<b>Yes (ends in street and bears right)</b>	<b>Ends in parking lot</b>	
R.S. < 8.3%	<b>No</b>	Yes	Yes	Yes	
C.S. < 2.0%	<b>No</b>	Yes	Yes	Yes	
Flared side < 10.0%	NA	NA	Na	NA	
Ramp width 48"	Yes	Yes	Yes	Yes	
Flush (< ¼") transition	Yes	Yes	<b>Heaving (Common side)</b>	Yes	
Proper drainage	Yes	Yes	Yes	Yes	
Top level landing	<b>No</b>	NA	NA	NA	
Top level landing @ 4 ft	<b>No</b>	NA	NA	NA	
Compliant diagonal curb ramp	NA	NA	NA	NA	
Detectable warning strip	Yes	<b>No</b>	<b>No</b>	<b>No</b>	
Fixed object in ramp or crosswalk	No	No	<b>Yes (manhole cover)</b>	NA	
Catch basin upgrade from curb ramp	NA	NA	NA	NA	
Compliant APS	NA	NA	NA	NA	

**Table B: Grafton North Main Street Curb Ramps**

Compliance Item	Mill Street	Overlook Street	Perry Street	Route 140/30 Intersection	Ray Street	Photo
Curb cut present	No	No	No	Yes	Yes	
Compliant apex ramp	NA	NA	NA	No	NA	
R.S. < 8.3%	NA	NA	NA	Yes	No	
C.S. < 2.0%	NA	NA	NA	Yes	No	See above photo
Flared side < 10.0%	NA	NA	NA	NA	NA	
Ramp width 48"	NA	NA	NA	Yes	Yes	
Flush (< ¼") transition	NA	NA	NA	Yes	No	See above photo
Proper drainage	NA	NA	NA	NA	NA	
Top level landing	NA	NA	NA	Not all	NA	
Top level landing @ 4 ft	NA	NA	NA	Not all	NA	See above photo
Compliant diagonal curb ramp	NA	NA	NA	Not all	NA	See above photo
Detectable warning strip	No	No	No	No	No	See above photo
Fixed object in ramp	NA	NA	NA	No	NA	
Catch basin upgrade from curb ramp	NA	NA	NA	NA	NA	
Compliant APS	NA	NA	NA	No	NA	



## **APPENDICES**

Appendix A: Survey Form

Appendix B: Public Notice

Appendix C: Reasonable Accommodations Policy

Appendix D: Reasonable Accommodations Request Form

## Appendix A: Survey Form

### **Grafton Self-evaluation Survey**

**Department/Board/Commission:** \_\_\_\_\_

1. Location of department/program (name of building, floor level, street address):
  
  
  
  
  
  
  
  
  
  
2. Describe the function of the department and any programs it offers or services that it provides.
  
  
  
  
  
  
  
  
  
  
3. Are there any circumstances in which the participation of a person with a disability in any program or service offered by your department would be restricted or excluded?

6. Is the public informed that these programs/services are prepared to make reasonable modifications?

7. Does the department/program have a formal or informal process for responding to requests for modifications?

8. Briefly describe general office/service communications. Specifically, how is information disseminated and communicated? Are there assistive devices or auxilliary aids (ie. TTY, TDD, sign language interpreter) which are used or available?

9. Are there any circumstances in which a person with a disability would be asked to pay a fee or meet any other requirements not imposed on other program/service participants? If yes, describe.

10. Does the program/service provide any separate activities for people with disabilities? If yes, describe.

11. Are there any circumstances in which a person with a disability would be prohibited from participating in regular activities because of the provision of separate activities?

12. Employment Practices.

a. Please list the number of full- and part-time employees.

b. Has any of these staff declared a disability? If yes, describe.



- e. Do any of the positions have formal job descriptions? If so, state which position and attach a copy of the job description as well as a sample job ad.

## Appendix B: Public Notice

**Town of Grafton**  
**Public Notice Under**  
**The Americans With Disabilities Act**

In accordance with the requirements of Title II of the Americans with Disabilities Act of 1990 ("ADA" hereafter), the Town of Grafton will not discriminate against qualified individuals with disabilities on the basis of disability in its services, programs, or activities.

**Employment.** The Town of Grafton does not discriminate on the basis of disability in its hiring or employment practices and complies with all regulations promulgated by the United States Equal Employment Opportunity Commission under Title I of the ADA.

**Effective Communication.** The Town of Grafton will generally, upon request, provide appropriate aids and services leading to effective communication for qualified persons with disabilities so they can participate equally in Town programs, services, and activities, including qualified sign language interpreters, documents in Braille, and other ways of making information and communications accessible to persons with speech, hearing and/or vision impairments.

**Modifications to Policies and Procedures.** The Town of Grafton will make all reasonable modifications to policies and programs to ensure that persons with disabilities have an equal opportunity to enjoy all of its programs, services, and activities.

**Procedure and Contact.** Anyone who requires an auxiliary aid or service for effective communication, or a modification of policies or procedures to participate in a program, service, or activity of the town of Grafton should contact the ADA Coordinator as soon as possible but no later than 72 hours before a scheduled event.

The ADA does not require the Town to take any action that would fundamentally alter the nature of its programs or services, or impose an undue financial or administrative burden.

Complaints and requests concerning the accessibility of programs, services and activities of the Town should be directed to:

Grafton Inspector of Buildings  
Grafton Memorial Municipal Center  
30 Providence Road  
Grafton, MA 01519

**Phone:** 508.839.5335 x1190

**Fax:** 508.xxx.xxxx

**Email:** [bergerr@grafton-ma.gov](mailto:bergerr@grafton-ma.gov)

The Town of Grafton will not place a surcharge on a particular individual with a disability or any group of individuals with disabilities to cover the cost of providing auxiliary aids and services or reasonable modifications of policy.

## Appendix C: Reasonable Accommodation Policy

**Town of Grafton**  
**Reasonable Accommodation Policy**

In accordance with the Americans with Disabilities Act, the Town of Grafton has adopted the following policy to address requests for reasonable accommodations made by people with disabilities in its employment, services, activities, policies, procedures, rules, and regulations.

Citizens, employees or applicants for employment of the Town of Grafton with qualified disabilities should address any requests for accommodation to the Town's ADA Coordinator using the "*Reasonable Accommodation Request Form*" available on the town's website or from the Office of the Town Administrator.

Written requests should be sent to: (Note: : Alternative means of filing a request such as personal interviews, phone calls, or taped requests, will be made available for persons with disabilities if unable to communicate their request in writing).

**ADA Coordinator**

Grafton Inspector of Buildings  
Grafton Memorial Municipal Center  
30 Providence Road  
Grafton, MA 01519

**Phone:** 508.839.5335 x1190

**Fax:** 508.xxx.xxxx

If the Town of Grafton can grant the accommodation, the requestor will be notified within two weeks of receipt of the request and no further action will be required by the requestor. The request will then be implemented by the appropriate Town Department.

If the Town of Grafton cannot grant the accommodation request, the requestor will be notified in writing of the decision, along with notification of the right to file a grievance under the Town's Grievance Procedure.

Appendix D: Reasonable Accommodation Request Form



**TOWN OF GRAFTON**  
**REQUEST FOR REASONABLE ACCOMMODATION FORM**

The Town requests the completion of this form to assist it in assessing your request for a reasonable accommodation. This initial information will be part of an interactive process with you as we explore your request. This form will be kept separate from your personnel file. The responses may generate the need for additional medical information.

**TO BE COMPLETED BY REQUESTOR**

Print Name \_\_\_\_\_ Date \_\_\_\_\_

Phone (work) \_\_\_\_\_ (personal) \_\_\_\_\_

☐ City Employee      ☐ Applicant for Employment      Other (please explain) \_\_\_\_\_

Dept/Div \_\_\_\_\_ Job Title \_\_\_\_\_

**APPLICANT**

A. What limitation(s) is interfering with your job application process? \_\_\_\_\_

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B. How does your limitation(s) interfere with your ability to participate in your job application process? \_\_\_\_\_

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C. Describe any suggested accommodation(s) that you believe will assist you in addressing the above-referenced limitation(s): \_\_\_\_\_

D. Explain how the requested accommodations(s) will assist you:\_\_\_\_\_

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E. If applicable, identify the source and/or cost (if known) for providing the accommodation(s):\_\_\_\_\_

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### **EMPLOYEE**

A. What limitation(s) is interfering with your job performance or accessing a benefit of employment?

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B. What job function(s) or benefits of employment are you having difficulty performing or accessing because of that limitation(s)?\_\_\_\_\_

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C. How does your limitation(s) interfere with your ability to perform your job function(s) or access a benefit of employment?\_\_\_\_\_

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D. Describe any suggested accommodation(s) that you believe will assist you in addressing the above-referenced limitation(s):\_\_\_\_\_

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F. If applicable, identify the source and/or cost (if known) for providing the accommodation(s):

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Requestor's Signature

Date

**RETURN THIS FORM TO THE  
GRAFTON ADA COORDINATOR**